IV. Environmental Impact Analysis
B. Air Quality

1. Introduction

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Project and evaluates whether Project emissions would conflict with or obstruct implementation of the applicable air quality plan; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. This section relies on information included in the *Air Quality and Greenhouse Gas Appendix*, provided in Appendix B of this Draft EIR.

2. Environmental Setting

a. Air Quality Background

(1) Air Quality and Public Health

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and to facilitate improvement in air quality. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations, such as asthmatics, children, and the elderly with a margin of safety, and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.[1] As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. New findings over time have, in turn, led to the revision and lowering of NAAQS which, in the judgment of the U.S. Environmental Protection Agency (USEPA), are necessary to protect

[1] *USEPA, NAAQS Table, www.epa.gov/criteria-air-pollutants/naaqs-table, accessed May 6, 2025.*

public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to the NAAQS.[2] The NAAQS and CAAQS are listed in Table IV.B-1 on page IV.B-3.

At the regional level, the South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange, Riverside and San Bernardino counties, including the Coachella Valley.[3] The City of Los Angeles (City) is located within the South Coast Air Basin (Air Basin), which is a distinct geographic subarea within the SCAQMD's jurisdiction. The SCAQMD, together with the Southern California Association of Governments (SCAG), has the responsibility for ensuring that national and state ambient air quality standards are achieved and maintained for the Air Basin. Failure to comply with these standards puts state and local agencies at risk for penalties in the form of lawsuits, fines, a federal takeover of state implementation plans, and a loss of funds from federal agencies, such as the Federal Highway Administration and Federal Transit Administration.

To meet the air quality standards, regional plans are developed, including the SCAQMD Air Quality Management Plan (AQMP), which incorporates regional demographic projections and integrated regional land use and transportation strategies from the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). These plans work together to examine multiple pollutants, cumulative effects, and transport issues related to attaining healthful air quality in the region. In addition, a host of regulatory standards at the federal, State, regional, and local level function to identify and limit exposure of air pollutants and toxic air contaminants (TACs).

(2) Local Air Quality and Air Pollution Sources

As mentioned above, the City is located within the Air Basin, which is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, in addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

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[2] *SCAQMD, Final 2022 AQMP, 2022, Appendix I, Health Effects, p. I-154.*

[3] *SCAQMD, Map of Jurisdiction, 1999.*

Table IV.B-1
Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
Ozone (O_3)	1 hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8 hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM_{10})	24 hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter ($PM_{2.5}$)	24 hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	9 µg/m^3	12 µg/m^3		
Carbon Monoxide (CO)	1 hour	35 ppm (40 mg/m^3)	20 ppm (23 mg/m^3)	Attainment	Attainment
	8 hour	9 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	1 hour	0.10 ppm (188 µg/m^3)	0.18 ppm (339 µg/m^3)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)		
Sulfur Dioxide (SO_2)	1 hour	0.075 ppm (196 µg/m^3)	0.25 ppm (655 µg/m^3)	Unclassified/ Attainment	Attainment
	3 hour	0.5 ppm (1,300 µg/m^3)	—		
	24 hour	0.14 ppm (365 µg/m^3)	0.04 ppm (105 µg/m^3)		
	Annual	0.03 ppm (80 µg/m^3)	—		
Lead (Pb)	30-day average	—	1.5 µg/m^3	Partial Non-Attainment[f]	Attainment
	Rolling 3-month average	0.15 µg/m^3	—		
Sulfates	24 hour	—	25 µg/m^3	—	Attainment
Hydrogen Sulfide (H_2S^-)	1 hour	—	0.03 ppm (42 µg/m^3)	—	Unclassified

ppm = parts per million by volume

µg/m^3 = micrograms per cubic meter

— = No federal or state standard

[a] *An ambient air quality standard is a concentration level expressed in either ppm or µg/m^3 and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a*

Table IV.B-1 (Continued)
Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.					
[b] *Ambient Air Quality Standards based on the 2022 AQMP.*					
[c] *"Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.*					
[d] *California and federal standard attainment status based on SCAQMD's 2022 AQMP and 2022 updates from CARB, ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.*					
[e] *In February 2024, USEPA lowered the federal $PM_{2.5}$ annual standard to 9.0 µg/m³ from the 12.0 µg/m³ standard set in 2012.*					
[f] *An attainment re-designation request is pending.*					
Source: SCAQMD, Final 2022 AQMP, December 2022. Compiled by Eyestone Environmental, 2025.					

The Air Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of a semi-permanent subtropical area of high pressure in the Pacific Ocean. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid to late afternoons on hot summer days. Winter inversions frequently break by midmorning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problem is the accumulation of carbon monoxide (CO) and nitrogen oxides (NO_X) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog.

Air pollutant emissions within the Air Basin are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce

electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

(3) Air Pollutant Types

(a) Criteria Pollutants

The six principal pollutants for which national and state criteria and standards have been promulgated and which are most relevant to current air quality planning and regulation in the Air Basin include ozone (O_3), respirable and fine particulate matter (PM_{10} and $PM_{2.5}$, respectively), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them.

(i) Ozone (O_3)

O_3 is a gas that is formed when volatile organic compounds (VOCs) and NO_X—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

(ii) Particulate Matter (PM_{10} and $PM_{2.5}$)

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter, PM_{10} and $PM_{2.5}$, consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, such as pollen and windstorms, are naturally occurring. However, in urban areas, such as the City, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. The human body naturally prevents the entry of larger particles into

the body. However, small particles can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

(iii) Carbon Monoxide (CO)

CO is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. In urban areas, such as the City, automobile exhaust accounts for the majority of CO emissions. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O_3, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

(iv) Nitrogen Dioxide (NO_2)

NO_2 is a NO_X compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic areas, particularly in urban areas, such as the City of Los Angeles, may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. NO_X irritates the nose and throat and increases one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is that it can act as a precursor to the formation of O_3.

(v) Sulfur Dioxide (SO_2)

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of

SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. Emissions of SO_2 aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants lead to higher rates of respiratory illness.

(vi) Lead (Pb)

Pb is a metal found naturally in the environment, as well as in manufactured products. The highest levels of Pb in the air are usually found near Pb smelters. The major sources of Pb emissions in the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Pb is also emitted from the sanding or removal of old lead-based paint (LBP). Pb emissions are primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

(b) Additional Criteria Pollutants (California Only)

In addition to the national standards, the State of California regulates State-identified criteria pollutants, including sulfates (SO_4^{2-}), hydrogen sulfide (H_2S), visibility-reducing particles, and vinyl chloride. With respect to the state-identified criteria pollutants, most land use development projects either do not emit them (i.e., H_2S [nuisance odor] and vinyl chloride), or otherwise account for these pollutants (i.e., SO_4^2 and visibility reducing particles) through other criteria pollutants. For example, SO_4^{2-} are associated with SO_X emissions, and visibility-reducing particles are associated with particulate matter emissions. A description of the health effects of the State-identified criteria air pollutants is provided below.

(i) Sulfates (SO_4^{2-})

SO_4^{2-} are the fully oxidized ionic form of sulfur. SO_4^{2-} occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to SO_4^{2-} in the atmosphere. Effects of SO_4^{2-} exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. SO_4^{2-} are particularly effective in degrading visibility and, due to the fact that they are usually acidic, can harm ecosystems, and damage materials and property.

(ii) Hydrogen Sulfide (H_2S)

H_2S is a colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing and natural emissions from geothermal fields. Industrial sources of H_2S include petrochemical plants and kraft paper mills. H_2S is also formed during bacterial decomposition of human and animal wastes and is present in emissions from sewage treatment facilities and landfills.[4] Exposure to H_2S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.[5] H_2S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.[6]

(iii) Visibility-Reducing Particles

Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size, and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., SO_4^{2-}, nitrates, organic carbon particles), which are the major constituents of particulate matter. As the number of visibility-reducing particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range.[7] Exposure to some haze-causing pollutants have been linked to adverse health impacts similar to PM_{10} and $PM_{2.5,}$ as discussed above.[8]

(iv) Vinyl Chloride

Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products and is generally emitted from industrial processes. Other major sources of vinyl chloride have been detected near landfills, sewage plants, and hazardous waste sites due to microbial breakdown of chlorinated

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[4] *CARB, Hydrogen Sulfide & Health, 2019, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed May 6, 2025.*

[5] *CARB, Hydrogen Sulfide & Health.*

[6] *CARB, Hydrogen Sulfide & Health.*

[7] *CARB, Visibility-Reducing Particles and Health, ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed May 6, 2025.*

[8] *CARB, Visibility-Reducing Particles and Health.*

solvents.[9] Short-term health effects from exposure to high levels of vinyl chloride in the air include central nervous system effects, such as dizziness, drowsiness, and headaches while long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage and has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.[10] Most health data on vinyl chloride relate to carcinogenicity; thus, the people most at risk are those who have long-term exposure to elevated levels, which is more likely to occur in occupational or industrial settings. However, control methodologies applied to industrial facilities generally prevent emissions to the ambient air.[11]

(c) Volatile Organic Compounds (VOCs) and Toxic Air Contaminants (TACs)

Although the SCAQMD's primary mandate is attaining the NAAQS and the CAAQS for criteria pollutants within the district, SCAQMD also has a general responsibility to control emissions of air contaminants and prevent endangerment to public health. As a result, the SCAQMD has regulated pollutants other than criteria pollutants, such as VOCs, TACs, greenhouse gases (GHGs), and stratospheric O_3-depleting compounds.

(i) VOCs

VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, VOCs are a prime component (along with NO_X) of the photochemical processes by which such criteria pollutants as O_3, NO_2, and certain fine particles are formed. They are, therefore, regulated as "precursors" to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products.

(ii) TACs

TACs is a term used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and include both carcinogens and non-carcinogens. The California Air Resources Board (CARB) and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the USEPA, which are identified on the California Air Toxics Program's TAC List. TACs are also not classified as "criteria" air pollutants. The greatest potential for TAC

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[9] *CARB, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed May 6, 2025.*

[10] *CARB, Vinyl Chloride & Health.*

[11] *CARB, Vinyl Chloride & Health.*

emissions during construction is related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel-fueled delivery trucks and stationary emergency generators. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

b. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding air quality at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Federal Clean Air Act
  - National Ambient Air Quality Standards
- California Clean Air Act
  - California Ambient Air Quality Standards
- California Code of Regulations
- State Programs for Toxic Air Contaminants
- State Diesel Risk Reduction Program
- South Coast Air Quality Management District
  - Air Quality Management Plan
  - Air Quality Guidance Documents
  - Rules and Regulations
- Southern California Association of Governments Regional Transportation Plan/ Sustainable Communities Strategy
- City of Los Angeles Air Quality Element
- City of Los Angeles Plan for a Healthy Los Angeles
- City of Los Angeles Municipal Code, Ordinance No. 187,714

(1) Federal

(a) Federal Clean Air Act

The federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the latest amendments occurring in 1990.[12] The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.[13] The USEPA is responsible for the implementation and enforcement of the CAA, which establishes the NAAQS, specifies future dates for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).[14]

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. Table IV.B-1 on page IV.B-3, shows the NAAQS currently in effect for each criteria pollutant and their corresponding attainment status. The Air Basin fails to meet national standards for O_3 and $PM_{2.5}$ and, therefore, is considered a federal "non-attainment" area for these pollutants. In addition, Los Angeles County fails to meet the national standard for Pb and, therefore, is considered a federal non-attainment area for Pb.

Title II pertains to mobile sources, which includes on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

The NAAQS and the CAAQS for the California criteria air pollutants (discussed below) have been set at levels considered safe to protect public health, including the health of sensitive populations and to protect public welfare.

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[12] *42 United States Code §7401 et seq. (1970).*

[13] *USEPA, Summary of the Clean Air Act, www.epa.gov/laws-regulations/summary-clean-air-act, accessed May 6, 2025.*

[14] *USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, last updated April 28, 2025, www.epa.gov/clean-air-act-overview/clean-air-act-text, accessed May 6, 2025. As shown therein, Title I addresses nonattainment areas, and Title II addresses mobile sources.*

(2) State

(a) California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both state and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table IV.B-1 on page IV.B-3 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State. As shown in Table IV.B-1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet State standards for O_3, PM_{10}, and $PM_{2.5}$ and, therefore, is considered a State "non-attainment" area for these pollutants.

(b) California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by State agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

(c) State Programs for Toxic Air Contaminants

The California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures, such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment, in order to reduce public exposure to DPM and other TACs. These actions are also supplemented by the Assembly Bill (AB) 2588 Air Toxics "Hot Spots" program and Senate Bill (SB) 1731, which require facilities to report their air

toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management plan. SCAQMD has further adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

(d) State Diesel Risk Reduction Program

CARB identified particulate emissions from diesel-fueled engines as TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which moved us into the risk management phase of the program. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines* and the *Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

(3) Regional

The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the South Coast Air Basin. The Air Basin is a subregion within the western portion of the SCAQMD jurisdiction as the SCAQMD also regulates portions of the Salton Sea Air Basin and Mojave Desert Air Basin within Riverside County.

(a) Air Quality Management Plan and Regional Transportation Plan/ Sustainable Communities Strategy

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The AQMPs are incorporated into the SIP. The 2022 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O_3 and $PM_{2.5}$ are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is

to reduce NO_X emissions[15] sufficiently to meet the O_3 standard deadlines as NO_X plays a critical role in the creation of O_3. Since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.[16] The 2022 AQMP is focused on attaining the 2015 8-hour O_3 standard of 70 parts per billion. The 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional strategies, such as regulation, accelerated development of available clean technologies, incentives and other CAA measures to achieve this standard.[17]

The SCAQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emission reductions across federal, state, and local levels and industries. The 2022 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with CARB and USEPA.

The 2022 AQMP also incorporates the transportation strategy and transportation control measures from the SCAG 2020–2045 RTP/SCS Plan.[18] SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG.[19] The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on the 2020–2045 RTP/SCS.

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[15] *NOx emissions are a precursor to the formation of both O_3 and secondary $PM_{2.5}$.*

[16] *Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2022 AQMP for detailed discussion).*

[17] *SCAQMD, Final 2022 AQMP, December 2022, p. ES-2.*

[18] *SCAG, Final 2020–2045 RTP/SCS, September 3, 2020.*

[19] *SCAQMD, Final 2022 AQMP, December 2022, p. ES-2.*

The 2022 AQMP forecasts the 2037 emissions inventories ‘‘with growth’’ based on SCAG’s 2020–2045 RTP/SCS. The region is projected to see a 12-percent growth in population, a 17-percent growth in housing units, an 11-percent growth in employment, and a 5-percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, State, and federal levels.[20]

On April 4, 2024, SCAG adopted the 2024–2050 RTP/SCS. Similar to the 2020–2045 RTP/SCS, the 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the existing and future needs of the region through projects, investments, policies and strategies. While the 2024–2050 RTP/SCS remains focused on its core responsibilities and on the requirements of comprehensive regional transportation planning integrated with the development of a sustainable communities strategy, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband and mobility hubs. The primary goals of the 2024–2050 RTP/SCS include:

- Mobility: Build and maintain an integrated multimodal transportation network;
- Communities: Develop, connect and sustain livable and thriving communities;
- Environment: Create a healthy region for the people of today and tomorrow; and
- Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.

While the 2024–2050 RTP/SCS has been adopted by SCAG, the 2024–2050 RTP/SCS has not yet been approved by CARB. In addition, as discussed above, SCAG’s 2020–2045 RTP/SCS forecasted population, housing, employment growth data were used to characterize regional growth in the 2022 AQMP.

(b) SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the SCAQMD Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[21] The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses. However, the SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the

[20] *SCAQMD, Final 2022 AQMP, December 2022, Figure 1-4.*

[21] *SCAQMD, CEQA Air Quality Handbook, April 1993.*

Air Quality Analysis Guidance Handbook. While this process is underway, the SCAQMD has provided supplemental guidance on the SCAQMD website to be used in conjunction with the Handbook.[22]

The SCAQMD has also adopted land use planning guidelines in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.[23] SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. The SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The SCAQMD has published a guidance document called the *Final Localized Significance Threshold Methodology* for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction or operation of a project.[24] The SCAQMD adopted additional guidance regarding $PM_{2.5}$ emissions in a document called *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds*.[25] The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

(c) SCAQMD Rules and Regulations

The SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards for land use development projects, which include, but are not limited to, the following:

Regulation IV—Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/ shutdown exemptions and breakdown events. The following is a list of rules that apply to the Project:

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[22] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993), accessed May 6, 2025.*

[23] *SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.*

[24] *SCAQMD, Final Localized Significance Threshold Methodology, June 2003 (Revised July 2008).*

[25] *SCAQMD, Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds, October 2006.*

- **Rule 401—Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than 3 minutes in any one hour, which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.

- **Rule 402—Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- **Rule 403—Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$), and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Best available control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.

Regulation XI—Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules that may apply to the Project:

- **Rule 1113—Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

- **Rule 1138—Control of Emissions from Restaurant Operations:** This rule specifies PM and VOC emissions and odor control requirements for commercial cooking operations that use chain-driven charbroilers to cook meat.

- **Rule 1146.2—Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_X emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

- **Rule 1186—PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM_{10} emissions by requiring the cleanup of material deposited onto paved roads, use of certified

street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Regulation XIII—New Source Review (NSR): Regulation XIII sets requirements for preconstruction review required under both federal and state statutes for new and modified sources located in areas that do not meet the CAA standards ("non-attainment" areas). NSR applies to both individual permits and entire facilities. Any permit that has a net increase in emissions is required to apply Best Available Control Technology (BACT). Facilities with a net increase in emissions are required to offset the emission increase by use of Emission Reduction Credits (ERCs). The regulation provides for the application, eligibility, registration, use and transfer of ERCs. For low emitting facilities, the SCAQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

Regulation XIV—Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units, which emit TACs or other non-criteria pollutants. The following is a list of rules that may apply to the Project:

- **Rule 1403—Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.
- **Rule 1470—Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition engines greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

(4) Local

(a) City of Los Angeles General Plan

(i) Air Quality Element

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use

decisions. In general, the City of Los Angeles' General Plan (including the Framework, Air Quality, Circulation [Mobility Plan], and Health and Wellness Elements) and the City of Los Angeles' Green New Deal contain policies and programs for the protection of the environment and health through improved air quality. These serve to provide additional critical guidance for the betterment of public health for the region and the City.

The most directly relevant of those plans, the City's General Plan Air Quality Element, was adopted on November 24, 1992, and sets forth the goals, objectives, and policies that guide the City in its implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies are relevant to land use development and relate to traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupant vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency in City facilities and private developments.

The Air Quality Element establishes six goals:

- Good air quality and mobility in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures, including passive measures, such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

The City is also responsible for the implementation of transportation control measures as outlined in the AQMP. Through capital improvement programs, the City can fund infrastructure that contributes to improved air quality by requiring such improvements as bus turnouts as appropriate, installation of energy-efficient streetlights, and synchronization of traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of

potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation measures.

(ii) Plan for a Healthy Los Angeles

The Health, Wellness, and Equity Element, Plan for a Healthy Los Angeles, adopted by the City Council on March 31, 2015, and amended in November 2021, lays the foundation to create healthier communities for all residents in the City. As an element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. With a focus on public health and safety, the Plan for a Healthy Los Angeles provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods; a clean environment (i.e., improved ambient and indoor air quality); the opportunity to thrive; and access to health services, affordable housing, and healthy and sustainably produced food.

(b) City of Los Angeles Municipal Code

In December 2022, the City approved Ordinance No. 187,714, which amends Divisions 2, 4, and 5 of Article 9 of Chapter IX of the LAMC to require all new buildings to be all-electric buildings with exceptions. The ordinance is applicable to new buildings in which an application for a building permit was submitted after June 1, 2023. Consistent with this new ordinance, Chapter IX of the LAMC, Section 99.02.202 defines an all-electric building as:

> *A building that contains no combustion equipment, plumbing for combustion equipment, gas piping, or fuel gas serving any use including, but not limited to, space heating (including fireplaces), water heating (including pools and spas), cooking appliances (including barbeques), and clothes drying, within the building or building property lines, and instead uses electricity as the sole source of energy for all lighting, appliances and/or equipment, including, but not limited to, space heating, water heating, cooking appliances, and drying appliances.*

Chapter IX of the LAMC, Section 99.04.106.8 provides exemptions from the requirements for cooking equipment contained within kitchens in a public use area, such as restaurants, commissaries, cafeterias, and community kitchens as long as electrical infrastructure is installed. Gas-powered process equipment in institutions, such as hospitals, industrial uses, and laboratories, are also exempt.

c. Existing Conditions

(1) Regional Air Quality

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Air Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors, such as wind, sunlight, temperature, humidity, rainfall, and topography, affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential.

The greatest air pollution throughout the Air Basin occurs from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. O_3 concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California. However, the Air Basin still fails to meet the national standards for O_3 and $PM_{2.5}$ and, therefore, is considered a federal non-attainment area for these pollutants. As discussed above, since 2019, no monitoring stations within the Air Basin has demonstrated an exceedance for Pb of the national standard, and an attainment redesignation for Pb is currently pending with the USEPA.

The SCAQMD has the responsibility for ensuring that all national and state ambient air quality standards are achieved and maintained throughout the Air Basin. To meet the standards, the SCAQMD has adopted a series of AQMPs. The 2022 AQMP includes strategies to ensure that rapidly approaching attainment deadlines are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions[26] sufficiently to meet the upcoming O_3 standard deadlines. The 2022 AQMP provides a baseline year 2018 inventory of 351 tons per day (tpd) of NO_X and modeling results show that NO_X emissions are projected to be 184 tpd in the 8-hour O_3 attainment year of 2037, due to continued implementation of already adopted regulatory actions baseline emissions. The 2022 AQMP suggests that total Air Basin emissions of NO_X must be reduced to 60 tpd in 2037 to attain the 8-hour O_3 standard. Although the existing air regulations and programs will continue to lower NO_X emissions in

[26] *NOx emissions are a precursor to the formation of both O_3 and secondary $PM_{2.5}$.*

the region, an additional 67 percent of reductions from the baseline year 2018 in the year 2037, is necessary to attain the 8-hour O_3 standard.[27,28]

The overall control strategy is an integral approach relying on fair-share emission reductions from federal, state and local levels. The AQMP is composed of stationary and mobile source emission reduction strategies from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies and reductions from federal sources, which include aircraft, locomotives, and ocean-going vessels. These strategies are to be implemented in partnership with CARB and USEPA. SCAG's 2020–2045 RTP/SCS[29] includes transportation programs, measures, and strategies generally designed to reduce VMT, which are contained in the AQMP.

As discussed previously, SCAG has the responsibility of preparing and approving the portions of the AQMP. SCAQMD combines its portion of the Plan with those prepared by SCAG. The RTP/SCS and Transportation Control Measures (TCMs), included as Appendix IV-C of the 2022 AQMP for the Air Basin, are based on SCAG's 2020–2045 RTP/SCS. The 2022 AQMP forecasts the 2037 emissions inventories ''with growth'' based on SCAG's 2020–2045 RTP/SCS. The region is projected to see a 12-percent growth in population, 17-percent growth in housing units, 11-percent growth in employment, and 5-percent growth in VMT between 2018 and 2037.

Despite past regional growth, air quality within the Air Basin has improved substantially over the years, primarily due to the impacts of air quality control programs at the local, state, and federal levels. Figure IV.B-1 on page IV.B-23 shows the percent change in air quality along with demographic data for the four-county region from the 2022 AQMP. In particular, Figure IV.B-1 illustrates the trends since 1995 of the 8-hour O_3 levels, the 1-hour O_3 levels, and annual average $PM_{2.5}$ concentrations (since 2001), compared to the regional gross domestic product, total employment and population. Human activity in the region has an impact on achieving reductions in emissions. However, the O_3 and PM levels continue to trend downward as the economy and population increase, demonstrating that it is possible to maintain a healthy economy while improving public health through air quality improvements.[30]

SCAQMD has released the Multiple Air Basin Toxics Exposure Study (MATES-V), which was aimed at estimating the cancer risk from toxic air emissions throughout the Air

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[27] *Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2022 AQMP for detailed discussion).*

[28] *SCAQMD, Final 2022 AQMP, 2022 (p. ES-4 2022 AQMP).*

[29] *SCAG, Final 2020–2045 RTP/SCS, September 2020.*

[30] *SCAQMD, Final 2022 AQMP, 2022 (p. 1-6).*

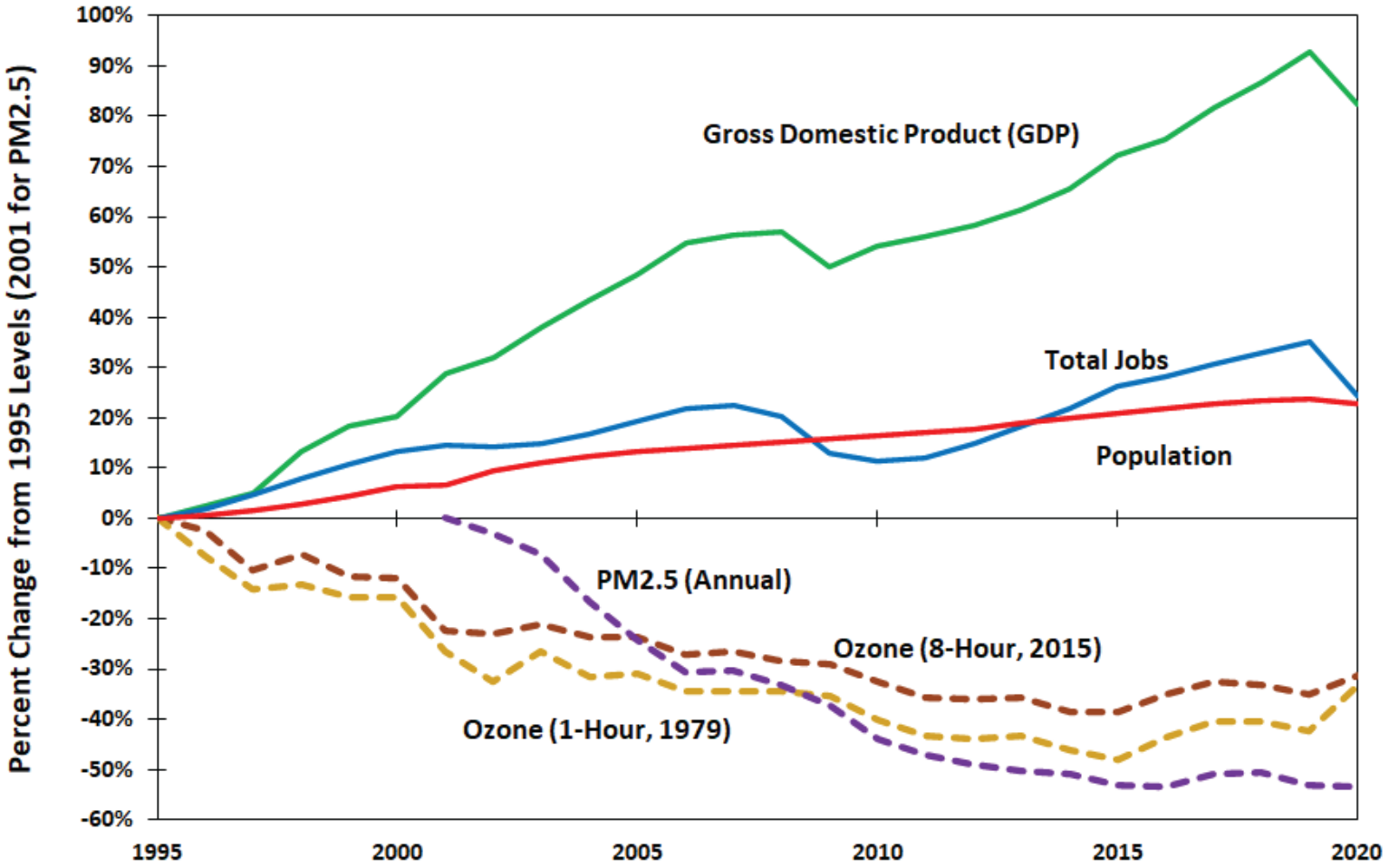


Figure IV.B-1
Ozone Trends

Source: AQMP, 2022.

Basin by conducting a comprehensive monitoring program, an updated emissions inventory of TACs, and a modeling effort to fully characterize health risks for those living in the Air Basin.[31] The MATES-V study concluded that the average carcinogenic risk from air pollution in the Air Basin is approximately 424 in one million over a 70-year duration. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 50 percent of the risk is attributed to DPM, approximately 25 percent to other toxics associated with mobile sources (including benzene, butadiene, and carbonyls), and approximately 25 percent of all carcinogenic risk is attributed to stationary sources (which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses, such as gas stations and chrome plating).[32]

As part of the MATES-V Study, the SCAQMD prepared a series of maps that shows regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The maps' estimates represent the number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years) in parts of the area. The MATES-V map is the most recently available map to represent existing conditions near the Project area. The estimated cancer risk for the vast majority of the urbanized area within the Air Basin ranges from 400 to over 1,200 cancers per million over a 70-year duration.[33] Risk from less urbanized areas of the Air Basin ranges from less than 100 to 400 cancers per million. Generally, the risk from air toxics is lower near the coastline and higher risks are concentrated near large diesel sources (e.g., freeways, airports, and ports).

(2) Local Air Quality

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial and industrial activity, space and water heating, landscape maintenance, consumer products, and mobile sources primarily consisting of automobile traffic. Motor vehicles are the primary source of pollutants in the local vicinity.

(a) Existing Pollutant Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin and has divided the Air Basin into 38 source receptor areas (SRAs)

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[31] *SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V) Final Report, August 2021.*

[32] *SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V) Final Report, August 2021.*

[33] *SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), MATES Data Visualization, Cancer Risk, https:// https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page?views=Cancer-Risk%2CClick-tabs-for-other-data, accessed May 6, 2025.*

in which 31 monitoring stations operate. Figure IV.B-2 on page IV.B-26 shows the locations of the SRAs located in Los Angeles County. The Project Site is located within SRA 1, which covers the Central Los Angeles area. The monitoring station most representative of the Project Site is the North Main Street Station, located at 1630 North Main Street in the City of Los Angeles, approximately 0.3 miles south of the Project Site. Criteria pollutants monitored at this station include PM_{10}, $PM_{2.5}$, O_3, CO, NO_2, Pb, and SO_4^{2-}. Table IV.B-2 on page IV.B-27 identifies the national and state ambient air quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured at this station through the period of 2021–2023.

(b) Existing Health Risk in the Surrounding Area

As shown in Figure IV.B-3 on page IV.B-29, based on the MATES-V model, the calculated cancer risk in the Project area is approximately 771 in one million.[34] The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., State Route [SR] 101, SR-110, and Interstate 5). In general, the risk at the Project Site is comparable with other urbanized areas in Los Angeles, which have a similar calculated cancer risk as the Project area.

Potential sources of TACs within the Project Site vicinity were identified using SCAQMD's Facility Information Database (FIND) search and site reconnaissance to identify potential non-permitted air toxic emitting sources (e.g., freeways, diesel trucks idling at warehouse distribution facilities in excess of 100 trucks per day).[35] As discussed above, US-110 is located approximately 700 to 2,000 feet north of the Project Site. Based on the FIND search conducted, no other major sources of TACs are located within a 0.25-mile radius of the Project Site. Minor emissions sources, such as boilers or emergency generators, are located within the Project vicinity, but no substantial permitted stationary sources (e.g., gasoline stations, dry cleaners, chrome plating operations) of TAC emissions within the Project Site vicinity were identified. The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool (CalEnviroScreen) that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site is located in the 97th percentile, which means that the Project Site is worse than average in terms of pollution in comparison to other communities within California.[36]

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[34] *SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Data Visualization, Cancer Risk.*

[35] *SCAQMD, Facility Information Detail (F.I.N.D.), www.aqmd.gov/nav/FIND, accessed May 6, 2025.*

[36] *OEHHA, CalEnviroScreen 4.0 MAP, https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/ accessed May 6, 2025.*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

21865 Copley Drive, Diamond Bar, CA 91765-4182
Information: 1-800-CUT-SMOG (1-800-288-7664)
Internet: http://www.aqmd.gov

Air Quality Reporting

Since 1977, the South Coast Air Quality Management District has served as the local government agency responsible for measuring, reporting and taking steps to improve air quality.

To inform the AQMD's 15 million residents about air quality conditions, the AQMD issues an air quality forecast each day and reports current air quality conditions for each numbered Monitoring Area and General Forecast Area depicted here.

This air quality information is transmitted to the public through newspapers, television, radio and pager services, through faxes to schools, through recorded messages on the AQMD's toll-free Smog Update telephone line, 1-800-CUT–SMOG, and on the AQMD's Internet Website http://www.aqmd.gov.

Newspapers, television and radio stations typically will report air quality information using the General Forecast Areas, shown in color below, which are larger groupings of the more specific Air Monitoring Areas.

The 1-800-CUT-SMOG (1–800-288-7664) line also provides smog forecast and current smog level information by ZIP code.

The AQMD's Internet Website provides both forecasts as well as smog levels for that day and the previous day. Forecasts for the next day normally are posted by noon.

General Forecast Areas & Air Monitoring Areas

Coastal
- Northwest Los Angeles County Coastal 2
- Southwest Los Angeles County Coastal 3
- South Los Angeles County Coastal 4
- North Orange County Coastal 18
- Central Orange County Coastal 20

Metropolitan
- Central Los Angeles County 1
- Southeast Los Angeles County 5
- South Central Los Angeles County 12
- North Orange County 16

San Fernando Valley
- West San Fernando Valley 6
- East San Fernando Valley 7
- Santa Clarita Valley 13

San Gabriel Valley
- West San Gabriel Valley 8
- East San Gabriel Valley 9
- Pomona/Walnut Valley 10
- South San Gabriel Valley 11

Inland Orange County
- Central Orange County 17
- Saddleback Valley 19
- Capistrano Valley 21

Riverside Valley
- Corona/Norco Area 22
- Metropolitan Riverside 23

San Bernardino Valley
- Northwest San Bernardino Valley 32
- Southwest San Bernardino Valley 33
- Central San Bernardino Valley 34
- East San Bernardino Valley 35

Hemet/Elsinore Area
- Perris Valley 24
- Lake Elsinore 25
- Hemet/San Jacinto Valley 28

Temecula/Anza Area
- Temecula Valley 26
- Anza Area 27

San Gabriel Mountains 15

San Bernardino Mountains
- West San Bernardino Mountains 36
- Central San Bernardino Mountains 37

Big Bear Lake 38

Banning Pass Area 29

Coachella/Low Desert
- Coachella Valley 30
- East Riverside County 31

ANTELOPE VALLEY APCD* 14

MOJAVE DESERT AQMD*
- Victor Valley 39
- Northern Mojave Desert 40
- Central Mojave Desert 41

*These agencies contract with the South Coast AQMD for forecasting services. Also, the Antelope Valley APCD contracts with the Mojave Desert AQMD for other services. For more air quality information in these areas, please call the Mojave Desert AQMD at (760) 245-1661, extension 5067.

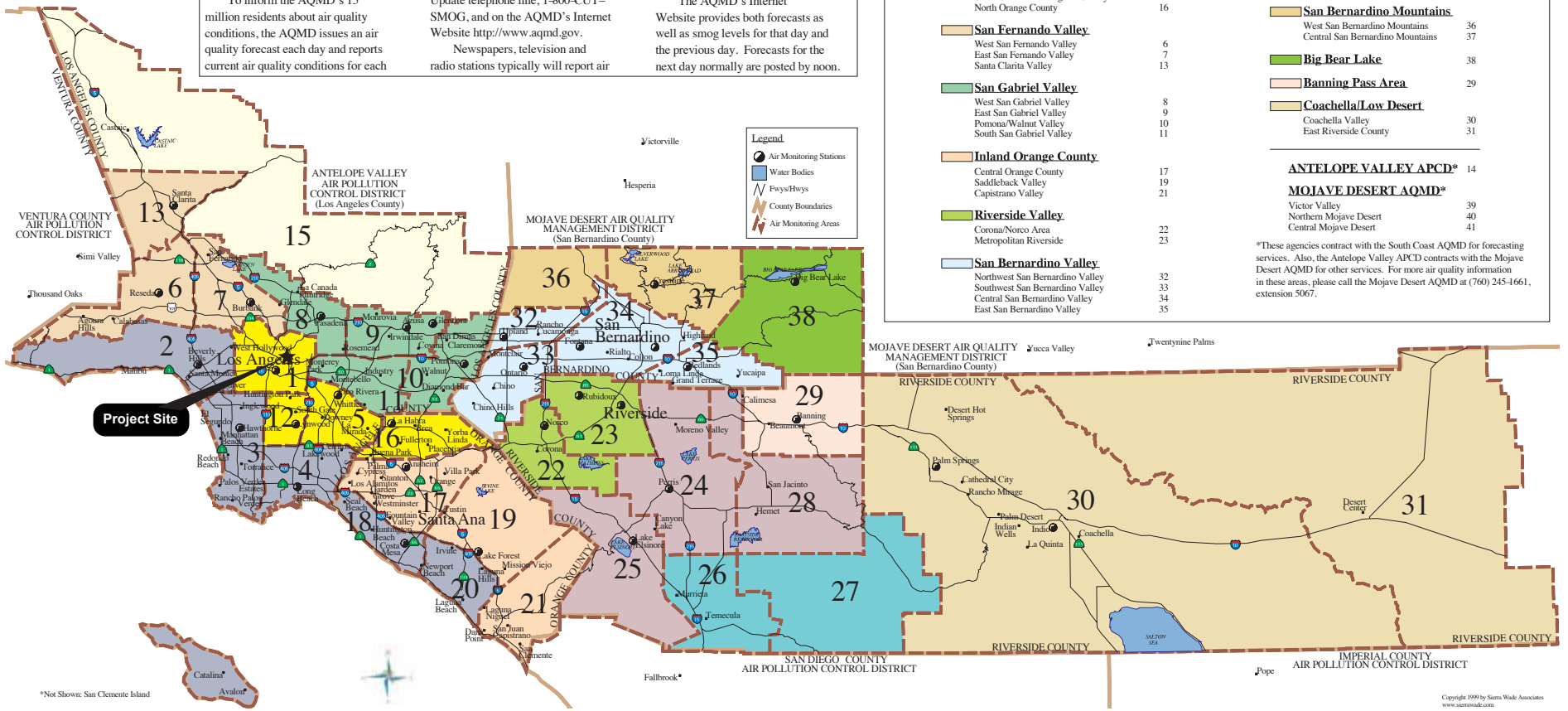


Figure IV.B-2
SCAQMD SRAs

Source: Sierra Wade Associates, 1999.

Table IV.B-2
Summary of Ambient Air Quality in the Project Vicinity

Pollutant	Year		
	2021	2022	2023
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.10	0.14	0.10
Days exceeding CAAQS (0.09 ppm)	1	1	1
Maximum 8-hour Concentration (ppm)	0.09	0.09	0.08
Days exceeding NAAQS (0.070 ppm)	2	6	7
Days exceeding CAAQS (0.07 ppm)	2	6	7
Respirable Particulate Matter (PM_{10})			
Maximum 24-hour Concentration (µg/m^3)	64	60	57
Days exceeding NAAQS (150 µg/m^3)	0	0	0
Days exceeding CAAQS (50 µg/m^3)	3	4	2
Annual Arithmetic Mean (µg/m^3)	26	29	24
Does measured AAM exceed CAAQS (20 µg/m^3)?	**Yes**	**Yes**	**Yes**
Fine Particulate Matter ($PM_{2.5}$)			
Maximum 24-hour Concentration (µg/m^3)	61	34	31
Days exceeding NAAQS (35 µg/m^3)	12	0	0
Annual Arithmetic Mean (µg/m^3)	13	11	10
Does measured AAM exceed NAAQS (12 µg/m^3)[a]?	**Yes**	No	No
Does measured AAM exceed CAAQS (12 µg/m^3)?	**Yes**	No	No
Carbon Monoxide (CO)			
Maximum 1-hour Concentration (ppm)	2	2	1
Days exceeding NAAQS (35.0 ppm)	0	0	0
Days exceeding CAAQS (20.0 ppm)	0	0	0
Maximum 8-hour Concentration (ppm)	2	2	1
Days exceeding NAAQS and CAAQS (9 ppm)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.08	0.08	0.06
Days exceeding CAAQS (0.18 ppm)	0	0	0
Annual Arithmetic Mean (ppm)	0.02	0.02	0.02
Does measured AAM exceed NAAQS (0.0534 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
Sulfur Dioxide (SO_2)			
Maximum 1-hour Concentration (ppm)	0.002	0.007	0.008
Days exceeding NAAQS (0.075 ppm)	0	0	0
Maximum 24-hour concentration (ppm)	N/A	N/A	N/A
Days exceeding CAAQS (0.04 ppm)	0	0	0
Days exceeding NAAQS (0.14 ppm)	0	0	0
Annual Arithmetic Mean (ppm)	N/A	N/A	N/A
Does measured AAM exceed NAAQS (0.030 ppm)?	0	0	0

Table IV.B-2 (Continued)
Summary of Ambient Air Quality in the Project Vicinity

Pollutant	Year		
	2021	2022	2023
Lead (Pb)[b]			
Maximum 30-day Average Concentration (µg/m^3)	0.012	0.008	0.007
Does measured concentration exceed NAAQS (1.5 µg/m^3)	No	No	No
Maximum Calendar Quarter Concentration (µg/m^3)	0.012	0.007	0.007
Does measured concentration exceed CAAQS (1.5 µg/m^3)	No	No	No
Sulfate (SO_4^{2-})			
Maximum 24-hour Concentration (µg/m^3)	4.4	5.8	6.5
Does measured concentration exceed CAAQS (25 µg/m^3)	No	No	No

AAM = annual arithmetic mean

ppm = parts per million by volume

µg/m^3 = micrograms per cubic meter

N/A = Not available at this monitoring station

[a] *In February 2024, USEPA lowered the federal $PM_{2.5}$ annual standard to 9.0 µg/m^3 from the 12.0 µg/m^3 standard set in 2012.*

[b] *As of 2019, no monitoring stations within the South Coast Air Basin demonstrated an exceedance of the Pb NAAQS. Attainment redesignation for Pb is currently pending with the USEPA. Values presented represent ambient concentrations from the SRA1 monitoring station.*

Source: SCAQMD Monitoring Data (2021–2023), www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed May 6, 2025.

(c) Surrounding Uses

The Project Site is located within an urbanized area and includes a mix of land uses located north of downtown Los Angeles within the vicinity of Chinatown neighborhood. The Project Site, including both the North Parcel and the South Parcel, is adjacent to the Los Angeles County Metropolitan Transportation Authority (Metro) A Line tracks to the southeast. The South Parcel is located approximately 400 feet south of the Metro A Line Chinatown Station. The Los Angeles State Historic Park (formerly Cornfield Park) contains 32 acres of active and passive open spaces and recreational amenities, located to the southeast of the Metro A Line tracks.[37] The Capitol Milling Company is located south of the Project Site and includes retail uses, restaurants, and offices. Various industrial, commercial, and warehouse uses are located along the southeastern side of North Spring Street and along Baker Street. A channelized portion of the Los Angeles River is located approximately 575 feet east of the

[37] *California State Parks, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 10, 2005, p. 3.*

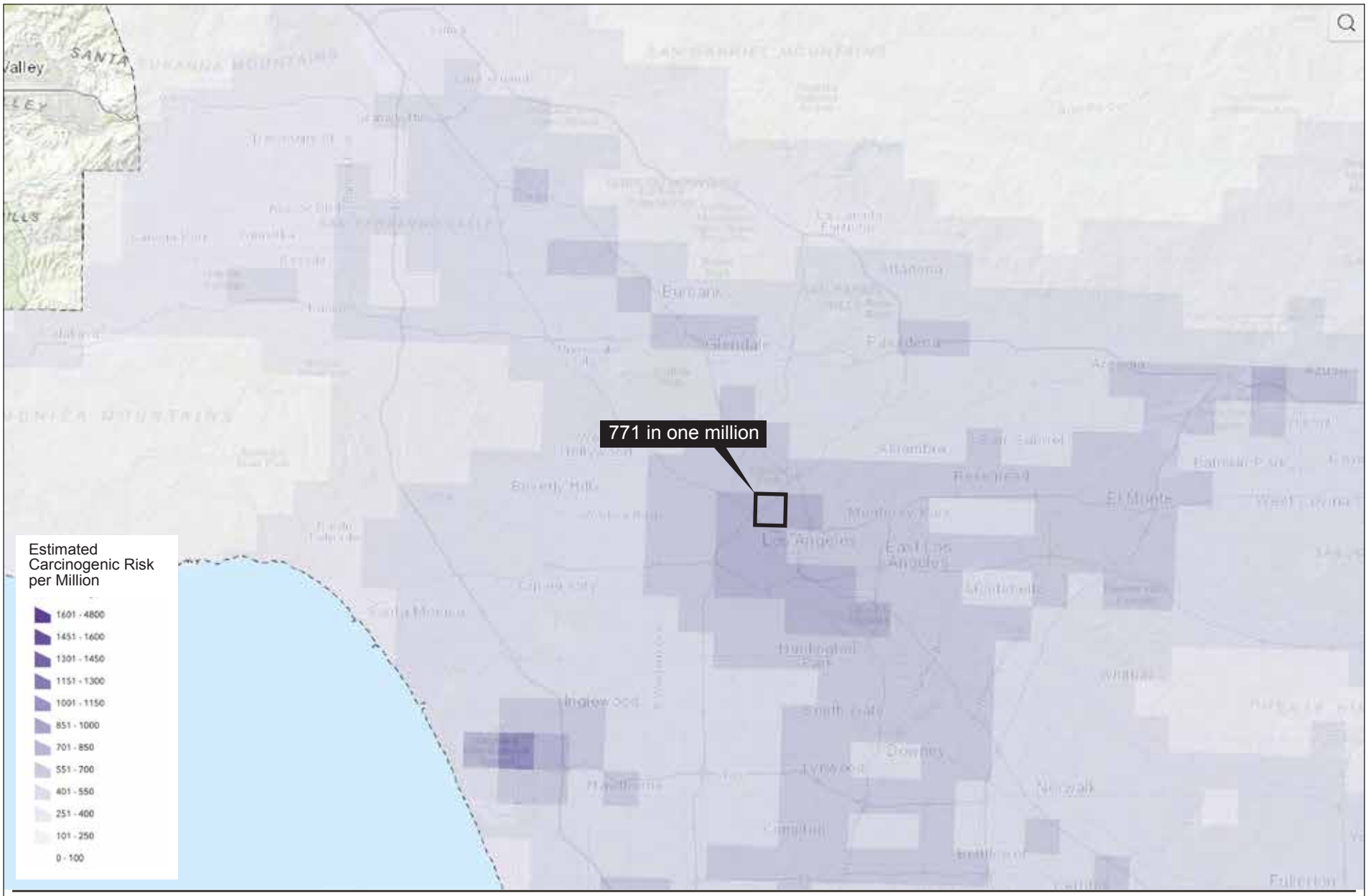


Figure IV.B-3
MATES V Total Cancer Risk for the Project Area

Source: South Coast AQMD, 2021.

of the northeastern most portion of the North Parcel. The South Parcel is largely located behind Mandarin Plaza commercial center, which includes one- and two-story commercial buildings and a two-level parking structure located along the frontage of North Broadway. Northwest of the Project Site, across North Broadway are various commercial uses, a high school, multiple religious centers, surface parking lots, multi-family residences, and vacant lots. In addition, located across North Broadway from the North Parcel is the approximately 600-acre Elysian Park, Radio Hill Gardens, and the Solano Canyon residential neighborhood, which includes single- and multi-family homes. Dodger Stadium is also located approximately 0.45 miles northwest of the Project Site.

(d) Sensitive Uses

Some population groups, including children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to air pollution than others. Sensitive land uses in the Project vicinity include residential uses discussed above and are shown in ***Figure IV.B-4. Residential uses are located to the north along Broadway adjacent to the Project Site. All other air quality sensitive receptors are located at greater distances from the Project Site and would be less impacted by Project emissions. Therefore, the Project's local (ambient) impacts are quantified only for the sensitive receptors depicted in Figure IV.B-4 on page IV.B-31.

(e) Existing Project Site Emissions

The Project Site is an approximately 8.08-acre site[38] is partially developed, with a one-story metal auto repair building and the rear of an existing off-site restaurant and parking areas that encroach onto the Project Site, as well as paved and unpaved areas currently used for transportation operations, construction staging, bus parking and other activities. North Broadway defines the northwestern boundary of the Project Site; North Spring Street is adjacent to the southern corner of the Project Site; and the Metro A Line right of way runs parallel and adjacent to the southeastern boundary of the Project Site. All existing structures on the Project Site would be removed in order to accommodate the proposed Project. Conservatively, emissions associated with the existing land uses were not considered in this analysis.

[38] *As noted in Section II, Project Description, of this Draft EIR, the Project involves the dedication of a three-foot-wide strip along North Broadway to the City resulting in a net acreage of 7.87 acres.*



Figure IV.B-4
Air Quality Sensitive Receptors Locations

Source: Google Earth Pro, 2024; Eyestone Environmental, 2024.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to air quality if it would:

Threshold (a): Conflict with or obstruct implementation of the applicable air quality plan.

Threshold (b): Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

Threshold (c): Expose sensitive receptors to substantial pollutant concentrations.

Threshold (d): Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

This analysis utilizes factors and considerations identified in the City's *L.A. CEQA Thresholds Guide*, as appropriate and as presented below, to assist in answering the Appendix G Threshold questions.

(2) 2006 L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide identifies the following factors to evaluate air quality impacts:

(a) Construction

(i) Combustion Emissions from Construction Equipment

- Type, number of pieces and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (i.e., diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

(ii) Fugitive Dust—Grading, Excavation and Hauling

- Amount of soil to be disturbed on-site or moved off-site;

- Emission factors for disturbed soil;
- Duration of grading, excavation and hauling activities;
- Type and number of pieces of equipment to be used; and
- Projected haul route.

(iii) Fugitive Dust—Heavy-Duty Equipment Travel on Unpaved Road

- Length and type of road;
- Type, number of pieces, weight and usage of equipment; and
- Type of soil.

(iv) Other Mobile Source Emissions

- Number and average length of construction worker trips to Project Site, per day; and
- Duration of construction activities.

(b) Operation

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the daily thresholds presented below (as reprinted from the CEQA Air Quality Handbook):

Pollutant	Significance Threshold (lbs/day)
ROG	55
NO_X	55
CO	550
PM_{10}	150
SO_X	150

- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The proposed project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or
  - The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

- The project creates an objectionable odor at the nearest sensitive receptor.

(c) Toxic Air Contaminants

The 2006 L.A. CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following factors: [39]

- The regulatory framework for the toxic material(s) and process(es) involved;
- The proximity of the TACs to sensitive receptors;
- The quantity, volume and toxicity of the contaminants expected to be emitted;
- The likelihood and potential level of exposure; and
- The degree to which project design will reduce the risk of exposure.

(3) SCAQMD's CEQA Air Quality Handbook

To assist in answering the Appendix G Threshold questions and factors identified in the City's *L.A. CEQA Thresholds Guide* for purposes of this analysis, the City of Los Angeles utilizes the thresholds of significance in SCAQMD's *CEQA Air Quality Handbook and SCAQMD supplemental information*, as identified below, to assess the significance of the Project's estimated air quality impacts. Specifically, Table IV.B-3 on page IV.B-35 shows SCAQMD's currently recommended significance thresholds, which provide numerical thresholds for evaluating the significance of a project's estimated air quality emissions.

(a) Construction

Based on the criteria set forth in SCAQMD's *CEQA Air Quality Handbook and SCAQMD supplemental information*,[40] the Project would have a significant impact if the Project's estimated construction emissions would cause any of the following to occur:

- Emissions from the Project's direct and indirect sources would exceed any of the SCAQMD significance threshold levels identified in Table IV.B-3 on page IV.B-35.

[39] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.*

[40] *SCAQMD, CEQA Air Quality Handbook, 1993.*

Table IV.B-3
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds[a]		
Pollutant	**Construction[b]**	**Operation**
NO_X	100 lbs/day	55 lbs/day
VOC[c]	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead[d]	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants[e]		
NO_2 1-hour average Annual Arithmetic Mean	SCAQMD is in attainment; project is significant if It causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual Average	10.4 $\mu g/m^3$ (construction)[f] & 2.5 $\mu g/m^3$ (operation) 1.0 $\mu g/m^3$	
$PM_{2.5}$ 24-hour average	10.4 $\mu g/m^3$ (construction) & 2.5 $\mu g/m^3$ (operation)	
SO_2 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal—99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 $\mu g/m^3$ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	1.5 $\mu g/m^3$ (state) 0.15 $\mu g/m^3$ (federal)	

lbs/day = pounds per day

[a] *SCAQMD CEQA Handbook (SCAQMD, 1993), pages 6-2 and 6-3.*

[b] *Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).*

[c] *Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.*

[d] *While the South Coast Air Quality Management District CEQA Air Quality Handbook contains significance thresholds for Pb, Project construction and operation would not include sources of Pb*

Table IV.B-3 (Continued)
SCAQMD Air Quality Significance Thresholds

emissions and would not exceed the significance thresholds for Pb. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial and residential land use projects, such as the Project. As a result, Pb emissions are not further evaluated in this Draft EIR.

[e] *Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.*

[f] *Ambient air quality threshold based on SCAQMD Rule 403.*

Source: South Coast Air Quality Management District, 2019.

- Maximum on-site daily localized emissions exceed the localized significance thresholds (LST), resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m^3] over a 1-hour period or 9.0 ppm [10,350 µg/m^3] averaged over an 8-hour period) and NO_2 (0.18 ppm [338.4 µg/m^3] over a 1-hour period, 0.1 ppm [188 µg/m^3] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [56.4 µg/m^3] averaged over an annual period).

- Maximum on-site localized PM_{10} or $PM_{2.5}$ emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed the incremental 24-hour threshold of 10.4 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.

(b) Operation

Based on the criteria set forth in SCAQMD's *CEQA Air Quality Handbook*,[41] the Project would have a significant impact if the Project's operational estimated emissions would cause any of the following to occur:

- Regional emissions from the Project's direct and indirect sources exceed any of the SCAQMD significance threshold levels identified in Table IV.B-3 on page IV.B-35.

- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO_2 (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).[42]

[41] *SCAQMD, CEQA Air Quality Handbook, 1993.*

[42] *SCAQMD, LST Methodology, June 2003, revised July 2008.*

- Maximum on-site localized operational PM_{10} and $PM_{2.5}$ emissions exceed the incremental 24-hour threshold of 2.5 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.[43]

- The Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or

- The Project creates an odor nuisance pursuant to SCAQMD Rule 402 (i.e., objectionable odor at the nearest sensitive receptor).

(c) Toxic Air Contaminants

Based on the criteria set forth in SCAQMD's *CEQA Air Quality Handbook*, the Project would have a significant toxic air contaminant impact, if:[44]

- The Project emits carcinogenic or toxic air contaminants that exceed the maximum incremental chronic and acute cancer risk as provided in Table IV.B-3 on page IV.B-35.

- The Project results in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. For projects with a maximum incremental cancer risk between 1 in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

(d) Consistency with Applicable Air Quality Plans

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with SCAQMD's *CEQA Air Quality Handbook*,[45] the following criteria are used to evaluate the Project's consistency with SCAQMD's AQMP:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations;
  - Cause or contribute to new air quality violations; or

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[43] *SCAQMD, Final-Methodology to Calculate Particulate Matter (PM) 2.5 and $PM_{2.5}$ Significance Thresholds, October 2006.*

[44] *SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a project) and Chapter 10 (Assessing Toxic Air Pollutants), April 1993.*

[45] *SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, 1993.*

  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?

- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?

  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;

  - Does the Project include air quality mitigation measures; or

  - To what extent is Project development consistent with the AQMP control measures?

In addition, the Project's consistency with the City of Los Angeles General Plan Air Quality Element is discussed below.

(e) Cumulative Impacts

Based on SCAQMD guidance, individual construction projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.[46] As discussed in SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution (August 2003):

> *As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*[47]

The cumulative analysis of air quality impacts within this Draft EIR follows SCAQMD's guidance such that construction or operational Project emissions will be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended daily threshold.

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[46] *Wong, Jillian, SCAQMD CEQA Specialist, personal communication, August 8, 2016.*

[47] *SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003, Appendix D.*

b. Methodology

This analysis focuses on the potential change in the air quality environment due to implementation of the Project. Air pollutant emissions would result from both construction and operation of the Project. Specific methodologies used to evaluate these emissions are discussed below.

Although SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with new development projects within the Air Basin, such as the Project. Instead, SCAQMD published the *CEQA Air Quality Handbook* in November 1993 to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects proposed in the Air Basin. The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*.[48]

In order to assist the CEQA practitioner in conducting an air quality analysis in the interim while the replacement *Air Quality Analysis Guidance Handbook* is being prepared, supplemental guidance/information is provided on the SCAQMD website and includes: (1) EMFAC on-road vehicle emission factors, (2) background CO concentrations, (3) localized significance thresholds, (4) mitigation measures and control efficiencies, (5) mobile source toxics analysis, (6) off-road mobile source emission factors, (7) $PM_{2.5}$ significance thresholds and calculation methodology, and (8) updated SCAQMD Air Quality Significance Thresholds.[49] SCAQMD also recommends using approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod). These recommendations were followed in the preparation of this analysis.

(1) Construction

Construction of the Project has the potential to generate temporary air pollutant emissions through the use of heavy-duty construction equipment, such as excavators and cranes, and through vehicle trips generated from workers and haul and delivery trucks traveling to and from the Project Site. In addition, fugitive dust emissions could result from demolition and various soil-handling activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment. Construction emissions can vary

[48] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed May 6, 2025.*

[49] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed May 6, 2025.*

substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

(a) Regional Emissions

The Project's "regional" emissions refer to emissions that will be evaluated based on regional significance thresholds established by SCAQMD, as discussed above. Daily regional emissions during construction are estimated by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying mobile source and fugitive dust emissions factors. The emissions are estimated using CalEEMod (Version 2022.1) software, an emissions inventory software program recommended by SCAQMD. The CalEEMod model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with SCAQMD and received input from other California air districts, and is currently used by numerous lead agencies in the Los Angeles area and within the state for quantifying the emissions associated with development projects undergoing environmental review, including by the City of Los Angeles.

CalEEMod is based on outputs from Off-road Emissions Inventory Program model[50] (OFFROAD) and EMission FACtor model[51] (EMFAC), which are emissions estimation models developed by CARB, and used to calculate emissions from construction activities, including off- and on-road vehicles, respectively. CalEEMod also relies upon known emissions data associated with certain activities or equipment (often referred to as "default" data, values or factors) that can be used if site-specific information is not available. CalEEMod contains default values to use in each specific local air district region. Appropriate statewide default values can be used, if regional default values are not defined. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. Construction tasks were aggregated to reflect overlapping tasks and identify the reasonably expected maximum construction emissions occurring over the course of Project construction. To be conservative, this analysis evaluates the Project's air quality impacts during construction based on reasonably expected maximum construction emissions even though such emissions would not occur throughout the entire

[50] *CARB, EMFAC 2021 Off-road Diesel Emission Factors, https://arb.ca.gov/emfac/emissions-inventory/61ef289e927b79fc507d282ca9b8db79e44c93e7, accessed May 6, 2025.*

[51] *CARB, EMFAC 2021 Onroad Emissions, https://arb.ca.gov/emfac/emissions-inventory/61ef289e927b79fc507d282ca9b8db79e44c93e7, accessed May 6, 2025.*

construction phase. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix B of this Draft EIR.

(b) Localized Emissions

The localized effects from the on-site portion of daily construction emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling, where appropriate, to assess whether the Project's local emissions would exceed SCAQMD's significance thresholds, as described above.[52] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, and $PM_{2.5}$.[53] SCAQMD does not provide an LST for SO_2, Pb, or H_2S since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. SCAQMD developed mass rate look-up tables for each source receptor area and to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres.[54]

(2) Operation

(a) Regional Emissions

Analysis of the Project's impact on regional air quality during long-term Project operations (i.e., after construction is complete) takes into consideration four types of sources: (1) area, (2) energy, (3) mobile, and (4) stationary. Area source emissions are generated by, among other things, landscape equipment, and the use of consumer products. Energy source emissions are generated as a result of activities in buildings for which natural gas is

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[52] *SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-Up Table, October 2009.*

[53] *SCAQMD, LST Methodology, June 2003, revised July 2008, p. 1-4.*

[54] *As discussed below, the LSTs were conservatively derived for 3.9-acres for each parcel (Phase 1-South Parcel is 3.9 acres and Phase 2-North Parcel is 4.0 acres).*

used (e.g., natural gas for cooking in commercial kitchens).[55] Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of the Project. Stationary source emissions are generated from proposed emergency generators during routine maintenance/testing.

Criteria pollutants are emitted during the generation of electricity at fossil fuel power plants. When electricity is used in buildings, the electricity generation typically takes place at off-site power plants, the majority of which burn fossil fuels. Because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered to be the maximum feasible level of mitigation for stack emissions. CalEEMod, therefore, does not calculate criteria pollutant emissions from regional power plants associated with on-site use.

Similar to construction, SCAQMD's CalEEMod model was used to estimate Project emissions during operation. Mobile-source emissions were calculated using CalEEMod. The CalEEMod default for VMT was bypassed to account for the Project-related VMT provided in the Transportation Assessment and Supplemental Transportation Assessment prepared for the Project, included as Appendix K.1 and K.2 of this Draft EIR, which were conducted consistent with Los Angeles Department of Transportation's (LADOT) *Transportation Assessment Guidelines*.[56,57] Consistent with these guidelines, the City and LADOT developed a "VMT Calculator" to comply with SB 743, which requires lead agencies to adopt VMT criteria to determine transportation related impacts. CalEEMod calculates mobile-source emissions using the Project's VMT, trip generation, and emission factors based on EMFAC2021.[58] Area source emissions are based on landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Emissions associated with use of emergency generators were calculated using CalEEMod, in which emission factors are based on Table 3.4-1 (Gaseous Emission Factors for Large Stationary Diesel Engines) from EPA's AP-42: Compilation of Air Pollutant Emission Factors for Stationary Sources. The emissions are based on the horsepower rating of the diesel generator and the number of hours operated per year for testing purposes.

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[55] *The Project's commercial component includes restaurant uses. Natural gas consumption for restaurant cooking is exempt under the City's all-electric buildings ordinance.*

[56] *Gibson Transportation Consulting, Inc., Transportation Assessment for the Buena Vista Project, Los Angeles, California, April 2022.*

[57] *Gibson, Supplemental Transportation Assessment for the Buena Vista Project, Los Angeles, California, August 14, 2024.*

[58] *CAPCOA, California Emissions Estimator Model, Appendix C: Calculation Details for CalEEMod, April 2022.*

To determine if a significant air quality impact would occur, the net increase in regional operational emissions generated by the Project was compared against SCAQMD's significance thresholds.[59] To be conservative, this analysis evaluates the Project's air quality impacts during operations based on reasonably expected maximum operational emissions even though such emissions would not occur throughout the entire operational phase. As discussed above, emissions associated with the existing land uses were conservatively not considered in this analysis. Operational emissions are calculated based on future buildout year. This is a conservative assumption as the CalEEMod and EMFAC models take into account more stringent vehicle emissions standards for future years. Refer to Appendix B of this Draft EIR for additional information regarding methodology.

(b) Localized Emissions

(i) On-Site Emissions

Localized impacts from Project operations include the calculation of on-site emissions (e.g., combustion from natural gas usage) using SCAQMD's recommended CalEEMod and evaluation of these emissions consistent with SCAQMD's LST methodology discussed above.

(ii) Off-Site Emissions

Potential localized CO concentrations from induced traffic at nearby intersections are also addressed, consistent with the methodologies and assumptions used in the consistency analysis provided in the 2003 AQMP. The 2003 AQMP was the latest AQMP to perform the modeling attainment demonstration for CO.[60]

It has been recognized that CO exceedances are caused by vehicular emissions,[61] primarily when idling at intersections.[62,63] Accordingly, vehicle emissions standards have become increasingly more stringent. Before the first vehicle emission regulations, cars in the 1950s were typically emitting about 87 grams of CO per mile.[64] Since the first regulation

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[59] *SCAQMD, SCAQMD Air Quality Significance Thresholds, revised March 2015. SCAQMD based these thresholds, in part, on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, CEQA Air Quality Handbook, April 1993, pp. 6-1 and 6-2.).*

[60] *SCAQMD, 2003 Air Quality Management Plan, Final 2003 AQMP Appendix V Modeling and Attainment Demonstrations, August 2003.*

[61] *USEPA, Air Quality Criteria for Carbon Monoxide, EPA 600/P-099/001F, 2000.*

[62] *SCAQMD, CEQA Air Quality Handbook, Section 4.5, 1993.*

[63] *SCAQMD, Air Quality Management Plan, 2003.*

[64] *USEPA, Timeline of Major Accomplishments in Transportation, Air Pollution, and Climate Change, www.epa.gov/air-pollution-transportation/timeline-major-accomplishments-transportation-air-pollution-and-climate, accessed May 6, 2025.*

of CO emissions from vehicles (model year 1966) in California, vehicle emissions standards for CO applicable to light duty vehicles have decreased by 96 percent for automobiles,[65,66] and new cold weather CO standards have been implemented, effective for the 1996 model year.[67] Currently, the CO standard in California is a maximum of 3.4 grams/mile for passenger cars (with provisions for certain cars to emit even less).[68] With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Air Basin have steadily declined.

The analysis prepared for CO attainment in the Air Basin by SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[69] As discussed in the 1992 CO Plan, peak CO concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The busiest intersection evaluated was Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.[70] Metro evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level E at peak morning traffic and Level F at peak afternoon traffic.[71,72] As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. If a project would potentially result

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65 *National Academy Board on Energy and Environmental Systems, Review of the 21st Century Truck Partnership, 2008, Appendix D: Vehicle Emission Regulations.*

66 *Kavanagh, Jason, Untangling U.S. Vehicle Emissions Regulations, 2008.*

67 *Title 13, California Code of Regulations, Section 1960.1(f)(2) [for 50,000 mile half-life].*

68 *CARB, California Exhaust Emission Standards and Test Procedures for 2001 and Subsequent Model Passenger Cars, Light-duty Trucks, and Medium-duty Vehicles, amended September 27, 2010.*

69 *SCAQMD, Federal Attainment Plan for Carbon Monoxide, 1992.*

70 *Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).*

71 *Metro measured traffic volumes and calculated the LOS for the intersection Wilshire Boulevard/ Sepulveda Avenue, which is a block west along Wilshire Boulevard, still east of Interstate 405.*

72 *Metro, Congestion Management Program for Los Angeles County, 2004, Exhibit 2-6 and Appendix A.*

in a CO hotspot based on the initial screening, detailed modeling may be performed using California LINE Source Dispersion Model, version 4 (CALINE4), which is a model used to assess air quality impacts near transportation facilities (i.e., roadways, intersections, and parking facilities).

(3) Toxic Air Contaminants Impacts (Construction and Operations)

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective (CARB's Handbook)*, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[73] SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.[74] Given that Page 2-3 of the SCAQMD guidance states that "the potential for public health impacts remains unchanged when siting sensitive receptors near a pollution source or a pollution source near a sensitive receptor," and has adopted similar siting distances from the CARB Handbook, the City as Lead Agency has elected to use the siting distances in Table 1-1 of the CARB Handbook for evaluating health risk impacts from both TAC sources and sensitive uses. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources and evaluating the potential for such sources to cause significant TAC impacts. This qualitative evaluation also takes into account the Project's potential source of TAC emissions and distance to sensitive receptors based on CARB siting distances. If the qualitative evaluation does not rule out significant impacts from a new TAC source, or modification of an existing TAC emissions source, a more detailed analysis is conducted. For the detailed analysis, downwind sensitive receptor locations are identified, and site-specific dispersion modeling is conducted to estimate Project impacts.

c. Project Design Features

No Project Design Features are proposed specific to air quality. However, the Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and is consistent with the requirements of Ordinance No. 187,714.

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[73] *CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.*

[74] *SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.*

d. Analysis of Project Impacts

Threshold (a): Would the Project conflict with or obstruct implementation of the applicable air quality plan?

(1) Impact Analysis

(a) SCAQMD CEQA Air Quality Handbook Policy Analysis

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on the 2020–2045 RTP/SCS. The 2022 AQMP forecasts the 2037 emissions inventories ''with growth'' based on SCAG's 2020–2045 RTP/SCS.[75]

In accordance with the procedures established in SCAQMD's *CEQA Air Quality Handbook and SCAQMD supplemental guidance*, the following criteria are required to be addressed in order to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Criterion 1: Would the project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations; or
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Would the project exceed the assumptions utilized in preparing the AQMP?
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP control measures?

[75] *SCAG recently released an updated RTP/SCS, Connect SoCal 2024 (also referred to as the 2024–2050 RTP/SCS), which was approved by SCAG's Regional Council in April 2024. However, as the 2022 AQMP is based off of the 2020–2045 RTP/SCS, the 2020–2045 RTP/SCS is included in this Draft EIR section for consistency.*

(i) Criterion 1

As discussed above in the Methodology discussion, SCAQMD provides localized significance thresholds to assess whether the Project's local emissions would be expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards. Consistent with SCAQMD guidance, regional emissions are not considered with respect to Criterion 1.[76] With respect to the first criterion, as discussed under the analysis for Threshold (c), below, localized concentrations of NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ have been analyzed for the Project. SO_2 emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or affect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

As shown in Table IV.B-5 on page IV.B-62 in the analysis below, the increases in PM_{10} and $PM_{2.5}$ emissions during construction would not exceed the SCAQMD-recommended significance thresholds at sensitive receptors in proximity to the Project Site. Additionally, the Project's maximum potential NO_X and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table IV.B-8 on page IV.B-66 in the analysis below, and detailed in Appendix B (CalEEMod Construction Output file) of this Draft EIR, NO_X and CO would not exceed the SCAQMD-recommended localized significance thresholds.

Because the Project would not introduce any substantial stationary sources of emissions (e.g., gasoline stations, dry cleaners, chrome plating operations), CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.[77] As indicated below, under the analysis for Threshold (c), no intersections would require a CO hotspot analysis, and impacts would be less than significant.

An analysis of potential localized operational impacts from on-site activities was also conducted. As shown in Table IV.B-9 on page IV.B-67 in the analysis below, localized NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ operational impacts would be less than significant. Therefore,

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[76] *SCAQMD, CEQA Air Quality Handbook: "If the analysis demonstrates a project is consistent with the regional air quality plans and local Air Quality Element, that does not mean that the project could not also have a significant effect on air quality by exceeding the significance threshold [regional]", Page 12-1. Put another way, consistency with the AQMP is addressed separately from the SCAQMD regional thresholds.*

[77] *SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, 1993.*

the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants and would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

(ii) Criterion 2

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020–2045 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) Project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data from the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's 2020–2045 RTP/SCS.

As described in Section IV.I, Land Use and Planning, of this Draft EIR, the General Plan of the City of Los Angeles serves as a comprehensive, long-term plan for future development of the City. Refer to the analysis below for a discussion of the Project's consistency with applicable goals, objectives, and policies of the City's General Plan Air Quality Element.

The 2020–2045 RTP/SCS provides forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area, these are used by SCAG in all phases of implementation and review. Economic assumptions including employment rates and migration due to jobs are also included as part of the RTP/SCS forecast projections.

The Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers who travel among construction sites within the region as individual projects are completed and are not typically brought from other regions to work on developments such as the Project. Moreover, these jobs would be relatively small in number and temporary in nature. Therefore, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2022 AQMP is based.

According to the 2020–2045 RTP/SCS, the population forecast for the City of Los Angeles Subregion in 2021 was approximately 4,078,197 residents.[78] In 2034, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 4,453,628 residents.[79] According to the 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2021 was approximately 1,897,886 employees.[80] In 2034, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 2,026,810 employees.[81]

Based on the generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 2,399 new residents and approximately 2,399 employees.[82, 83] The Project's estimated increase of 2,399 residents would constitute approximately 0.64 percent of the population growth forecasted between 2021 and 2034 in the 2020–2045 RTP/SCS.[84] In addition, the Project's estimated increase of 146 employees would constitute approximately 0.11 percent of the employment growth forecasted between 2021 and 2034 in the 2020–2045 RTP/SCS.[85] Therefore, the Project's contribution to population and employment growth would be consistent with projections contained in the 2020–2045 RTP/SCS.

With regard to consistency with growth projections for the 2024–2050 RTP/SCS, as illustrated in Table IV.K-2 in Section IV.K, Population and Housing, of this Draft EIR, the Project would represent approximately 0.26 percent of the projected growth in the SCAG region between 2021 and 2034 (i.e., the Project's baseline and buildout years) and approximately 0.02 percent of the projected employment growth in the SCAG Region between 2021 and 2034. Therefore, the Project's contribution to population and employment

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78 *Based on a linear interpolation of 2016–2045 data.*

79 *Based on a linear interpolation of 2016–2045 data.*

80 *Based on a linear interpolation of 2016–2045 data.*

81 *Based on a linear interpolation of 2016–2045 data.*

82 *Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions. The generation rate of 2.25 people per dwelling unit for "Multi-Family Residential" land use is applied to the 786 dwelling units. The generation rate of 3.14 per dwelling unit for "Affordable Housing – Family" land use is applied to the 200 affordable housing units. As documented in Attachment A, VMT Analysis LADOT Calculator Worksheets, of the Project's Transportation Assessment (Appendix K.2 of this Draft EIR), the Project would generate approximately 2,399 residents.*

83 *The Project's increase in residents (2,399) ÷ Increase in residents in City of LA subregion from 2021 to 2034 (375,431) = 0.64 percent*

84 *The Project's increase in residents (2,399) ÷ Increase in residents in City of LA subregion from 2021 to 2034 (375,431) = 0.64 percent*

85 *The Project's increase in employees (146) ÷ Increase in employment in City of LA subregion from 2021 to 2034 (128,924) = 0.11 percent.*

growth under SCAG's 2024–2050 RTP/SCS would be similar to the contribution under SCAG's 2020–2045 RTP/SCS.

As discussed previously, the 2022 AQMP is based on the 2020–2045 RTP/SCS, which incorporates data from General Plans, as well as local land use data, such as the Central City North Community Plan—the land use plan applicable to the Project Site. The Project-related population and employment growth would be well within the Citywide growth projections. As such, the Project would be consistent with the growth projections in the AQMP.

As similar population and employment projections form the basis of the AQMP, the Project would be consistent with the projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

The Project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) as required by SCAQMD, as summarized above. Furthermore, and as analyzed in detail below under Threshold (b), with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. Therefore, the Project is not required to implement air quality mitigation measures. As such, the Project meets this AQMP consistency criterion.

- To what extent is project development consistent with AQMP control measures?

Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. SCAQMD combines its portion of the Plan with those prepared by SCAG. The TCMs, included as Appendix IV-C of the 2022 AQMP/SIP for the Basin, are based on SCAG's 2020–2045 RTP/SCS.

With regard to land use developments, such as the Project, the 2020–2045 RTP/SCS land use control measures (i.e., goals and policies) focus on locating future growth within High Quality Transit Areas (HQTAs) and reducing vehicle trips and VMT. The Project represents an infill development within an existing urbanized area that would concentrate

new residential and commercial uses within an HQTA.[86,87] Therefore, the Project would be consistent with SCAG's 2020–2045 RTP/SCS as it is located within an HQTA as designated by the 2020–2045 RTP/SCS and a Priority Development Area (PDA) (i.e., [Neighborhood Mobility Area] NMA and Livable Corridor) as designated by the 2024–2050 RTP/SCS.[88,89,90] Therefore, the Project would be consistent with SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS. The Project would be designed and constructed with sustainability and transit orientation as guiding principles. The Project Site is served by the Metro A Line Chinatown Station, located approximately 400 feet south of the Project Site, and Union Station, located approximately 0.65 miles southeast of the Project Site which provides connection to Metro B and D Lines. Additional transit options include LADOT DASH lines Downtown B and Lincoln Heights/Chinatown; LADOT Commuter Express lines 409 and 419; Metro local lines 28, 33, 45, 70, 76, 78, 81, 90, 94, and 96; Santa Clarita Transit lines 794 and 799; Antelope Valley Transit Authority line 785; and the Torrance Transit line 4X. The Project would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the Los Angeles Municipal Code (LAMC).

As further discussed in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project design includes characteristics that would reduce trips and VMT as compared to a standard project within the Air Basin as measured by the air quality model (CalEEMod).[91] While these Project characteristics primarily reduce GHG emissions, they would also reduce criteria air pollutants discussed herein. These relative reductions in vehicle trips and VMT

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[86] *Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.*

[87] *SCAG, High Quality Transit Areas (HQTA) 2045—SCAG Region, https:// https://rdp.scag.ca.gov/portal/home/webmap/viewer.html?useExisting=1&layers=9a84ba5df63e45a1bb904dc76bf59863, accessed May 6, 2025.*

[88] *Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.*

[89] *SCAG, High Quality Transit Areas (HQTA) 2045—SCAG Region, https:// https://rdp.scag.ca.gov/portal/home/webmap/viewer.html?useExisting=1&layers=9a84ba5df63e45a1bb904dc76bf59863, accessed May 6, 2025.*

[90] *The 2020–2045 RTP/SCS mapped the Project as being located within a SCAG-designated HQTA. The 2024–2050 RTP/SCS does not use the HQTA designation as part of its Priority Development Areas (previously referred to as Priority Growth Areas) and instead uses Livable Corridors. Livable Corridors are defined as areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. SCAG also recognizes that many of these key corridors are also High Quality Transit Corridors (HQTCs).*

[91] *"Standard Project" refers to a Project that would be developed under statewide average conditions (assumed analogous to an ITE baseline). Consistent with statewide average conditions, this assumes that a development would not be located in an urban setting in close proximity to job centers or major transit stations.*

from a standard project within the Air Basin help quantify the criteria air pollutant emissions reductions achieved by locating the Project on an infill site within an HQTA, thereby promoting the use of alternative modes of transportation. Specifically, the Project would introduce residential uses on the Project Site in proximity to existing office, retail, and restaurant uses, as well as those proposed by the Project, which would reduce VMT by encouraging walking and non-automotive forms of transportation; introduce new residential uses in close proximity to job centers, and increase transit accessibility by locating new residential units within 0.25 miles of existing bus routes and the Metro A Line Chinatown Station. Details regarding VMT reduction due to Project Site characteristics are provided in Appendix B of this Draft EIR.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors, such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the USEPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.[92] The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features, such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites.

As mentioned above, the Project would promote the use of alternative modes of transportation, including convenient access to public transit, opportunities for walking and biking, thereby facilitating a reduction in VMT. The Project is consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. Implementation of these sustainability features would contribute to a reduction in air quality emissions via a reduction in VMT. Accordingly, as the Project would support SCAG's and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project is consistent with the 2020–2045 RTP/SCS (i.e., control measures of the AQMP). Further, a discussion of the Project's consistency with the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS is included in Section IV.I. Land Use and Planning, of this Draft EIR.

[92] *USEPA, Mixed-Use Trip Generation Model, www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed on May 6, 2025.*

In conclusion, the determination of AQMP consistency is primarily based on the long-term impacts of the Project on air quality in the Air Basin. The Project represents an infill development near transit within an existing urbanized area that would concentrate new commercial and residential uses within an HQTA and a NMA/Livable Corridor/HQTC, thus reducing VMT. The Project would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement measures to control NO_X, PM_{10}, and $PM_{2.5}$ emissions. As discussed above, the Project would be consistent with the goals and policies of the AQMP.

(b) City of Los Angeles Policies

The Air Quality Element of the City's General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals.

The Project would provide opportunities for the use of alternative modes of transportation, including access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. Specifically, the Project includes 802 bicycle parking spaces consisting of 80 short-term spaces and 722 long-term spaces. In addition, the Project would be consistent with the development pattern in the vicinity that features greater concentration of urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and within 0.25 miles of major transit stops. Additionally, as discussed in Section II, Project Description, of this Draft EIR, the Project would provide preferential parking for carpools and low-emitting and zero emission vehicles. The Project would also comply with applicable City and CALGreen charging requirements, which includes the provision of at least 40 percent of overall residential parking spaces provided on the Project Site that are capable of supporting future electric vehicle supply equipment (EVSE) with 10 percent of the overall residential spaces equipped with EVSE to create electric vehicle (EV) charging stations and 30 percent of overall non-residential parking spaces provided on the Project Site that are capable of supporting future EVSE and 20 percent of the overall non-residential spaces equipped with EVSE to create EV charging stations. Provisions of the EVSE and EV charging stations would help to facilitate and encourage use of alternative fueled vehicles.

A more detailed analysis of the Project's consistency with the City's General Plan is presented in Table IV.B-4 on page IV.B-54 and demonstrates the Project's consistency with these goals. Accordingly, the Project would promote the City of Los Angeles General Plan Air Quality Element goals, objectives, and policies applicable to the Project.

Table IV.B-4
Project Consistency with City of Los Angeles General Plan (Air Quality Element)

Goals, Objectives, and Policies	Analysis of Project Consistency
Air Quality Element	
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	**No Conflict.** The Project would introduce a mixed-use development contributing to the continued development of the Central City North Community Plan area as an area for residential, employment, and retail services. The Project's residential and commercial uses would allow residents, employees, and visitors to travel to jobs, dining, and shopping nearby, resulting in a reduction in VMT. The Project would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. Transit accessibility and the bicycle parking spaces provided on-site would further reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation. The Project would also allow existing residents to travel to jobs, dining, and shopping nearby, resulting in a reduction in VMT. Therefore, the Project would not conflict with this objective.
Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.	**No Conflict.** The Project's location, land use characteristics, and Project design features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be consistent with the relevant SCAG growth projections in the SCAG 2020–2045 RTP/SCS which were used in preparing the 2022 AQMP. The growth projections in the SCAG 2024–2050 are similar to the growth projections in the SCAG 2020–2045 RTP/SCS. The Project includes bicycle parking spaces for the proposed uses as required by the LAMC and is well served by transit, including local and regional bus and Metro. The Project would also provide multi-modal transportation solutions to connect with surrounding public transit lines, encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit. The Project would, thus, result in fewer trips, reducing air emissions with increased traffic mobility while also sustaining economic growth compared to a project without these design features. Therefore, the Project would not conflict with this objective.
Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites. **Policy 1.3.1:** Minimize particulate emission from construction sites.	**No Conflict.** The Project would comply with SCAQMD Rule 403, which requires dust control measures during construction activities. The Project would require the construction contractor(s) to comply with the applicable provisions of CARB's In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of diesel particulate matter filters and the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. In addition, the Project would not include large areas of unpaved surfaces and would replace existing surface parking lots with structured parking. Parking areas would

Table IV.B-4 (Continued)
Project Consistency with City of Los Angeles General Plan (Air Quality Element)

Goals, Objectives, and Policies	Analysis of Project Consistency
	be maintained in a clean and well-kept manner. The Project would, thus, reduce particulate emissions emanating from unpaved areas, parking lots, and construction sites.
Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**No Conflict.** The Project Site is located in proximity to mass transit, encouraging alternative modes of transit, thereby reducing the distance traveled for future residents and employees. The Project Site is approximately 400 feet from the Metro A Line Chinatown Station and approximately 0.65 miles from Union Station which provides connection to Metro B and D Lines. Additional transit options include LADOT DASH lines Downtown B and Lincoln Heights/Chinatown; LADOT Commuter Express lines 409 and 419; Metro local lines 28, 33, 45, 70, 76, 78, 81, 90, 94, and 96; Santa Clarita Transit lines 794 and 799; Antelope Valley Transit Authority line 785; and the Torrance Transit line 4X. The Project's mix of uses, proximity to jobs and commercial services, and the option to use alternative modes of transportation would reduce reliance on single-occupant vehicles. Therefore, the Project would not conflict with this goal.
Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	**No Conflict.** The Project Site is approximately 400 feet from the Metro A Line Chinatown Station and approximately 0.65 miles from Union Station which provides connection to Metro B and D Lines. Additional transit options include LADOT DASH lines Downtown B and Lincoln Heights/Chinatown; LADOT Commuter Express lines 409 and 419; Metro local lines 28, 33, 45, 70, 76, 78, 81, 90, 94, and 96; Santa Clarita Transit lines 794 and 799; Antelope Valley Transit Authority line 785; and the Torrance Transit line 4X. The accessibility to mass transit would encourage residents, employees, and visitors to utilize alternative modes of transportation, which would contribute to the reduction in work trips. The Project would also locate new housing proximate to jobs accessible by pedestrians and bicyclists. The Project's mix of uses, proximity to jobs and commercial services, and the option to use alternative modes of transportation would help reduce trips, which is necessary to achieve regional air quality goals. Therefore, the Project would not conflict with this objective.
Policy 2.1.1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	No Conflict. The Project Site is approximately 400 feet from the Metro A Line Chinatown Station and approximately 0.65 miles from Union Station which provides connection to Metro B and D Lines. Additional transit options include LADOT DASH lines Downtown B and Lincoln Heights/ Chinatown; LADOT Commuter Express lines 409 and 419; Metro local lines 28, 33, 45, 70, 76, 78, 81, 90, 94, and 96; Santa Clarita Transit lines 794 and 799; Antelope Valley Transit Authority line 785; and the Torrance Transit line 4X.

Table IV.B-4 (Continued)
Project Consistency with City of Los Angeles General Plan (Air Quality Element)

Goals, Objectives, and Policies	Analysis of Project Consistency
	In addition, the Project would provide 802 bicycle parking spaces, including 80 short-term and 722 long-term spaces. The Project's mix of uses, proximity to jobs and commercial services, and the option to use alternative modes of transportation would help reduce trips and VMT. Therefore, the Project would not conflict with this policy.
Objective 3.1: It is the objective of the City of Los Angeles to increase the portion of work trips made by transit to levels that are consistent with the goals of the Air Quality Management Plan and the Congestion Management Plan.	**No Conflict.** The Project Site is approximately 400 feet from the Metro A Line Chinatown Station and approximately 0.65 miles from Union Station which provides connection to Metro B and D Lines. The accessibility of mass transit would encourage employees and visitors of the Project to utilize alternative modes of transportation, which would contribute to the reduction in work trips. As such, the Project would not conflict with this objective.
Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	**No Conflict.** The Project would reduce VMT due to its infill location and providing a mixed-use development in a heavily populated area, near Downtown, and in proximity to public transportation approximately 400 feet of the Project Site. The Project's mix of uses, proximity to jobs and commercial services, and the option to use alternative modes of transportation would help reduce trips and VMT and mobile source emissions. Therefore, the Project would not conflict with this goal.
Objective 4.1: It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.	**No Conflict.** The Project analysis of potential air quality impacts relied upon the numeric significance thresholds established by the SCAQMD, which considers attainment of the ambient air quality standards. The mixed-use Project would be developed in an HQTA and a NMA/Livable Corridor/HQTC, which is a primary consideration in land use planning that contributes to the reduction in VMT which reduces air quality pollutant emissions. As such, the Project would not conflict with this objective.
Policy 4.1.2: Ensure that project level review and approval of land use development remain at the local level.	**No Conflict.** The Project environmental review and approval would occur at the local level. This Project-level EIR is being conducted by the City pursuant to CEQA requirements. As a result, the Project would not conflict with this policy.
Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and VMT associated with land use patterns.	**No Conflict.** The Project would reduce VMT due to its infill location and providing a development of residential uses in a densely populated area, near Downtown, and in proximity to public transportation approximately 400 feet of the Project Site. As such, the Project would not conflict with this objective.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**No Conflict.** The Project would reduce VMT due to its infill location and providing a mixed-use development near places of employment, and access to public transportation approximately 400 feet of the Project Site. The Project Site

Table IV.B-4 (Continued)
Project Consistency with City of Los Angeles General Plan (Air Quality Element)

Goals, Objectives, and Policies	Analysis of Project Consistency
	also provides access to retail and restaurant uses. Therefore, the Project would not conflict with this policy.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**No Conflict.** The Project contains internal pedestrian pathways that connect to the existing sidewalk network and will add a signalized crosswalk on the North Parcel to provide connectivity to Elysian Park. In addition, the Project would provide 802 bicycle parking spaces, including 80 short-term and 722 long-term spaces. The Project would also comply with City and CALGreen requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas. The Project would locate a mixed-use development proximate to transit. The Project Site is approximately 400 feet from the Metro A Line Chinatown Station and approximately 0.65 miles from Union Station which provides connection to Metro B and D Lines. Additional transit options include LADOT DASH lines Downtown B and Lincoln Heights/Chinatown; LADOT Commuter Express lines 409 and 419; Metro local lines 28, 33, 45, 70, 76, 78, 81, 90, 94, and 96; Santa Clarita Transit lines 794 and 799; Antelope Valley Transit Authority line 785; and the Torrance Transit line 4X. Therefore, the Project would not conflict with this policy.
Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**No Conflict.** The environmental review conducted for the Project includes an analysis of air quality impacts, as presented in this section of this Draft EIR, which would be considered by the decision-maker(s) prior to taking any actions on the Project's discretionary approvals. Therefore, the Project would not conflict with this policy.
Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**No Conflict.** The Project would occupy an infill location within 400 feet of existing public transportation, which would help to promote transit usage and, in turn, reduce the number of vehicle trips to and from the Project Site. In addition, the Project would provide 802 bicycle parking spaces, including 80 short-term and 722 long-term spaces. Moreover, the Project is providing reduced parking compared to the current code, encouraging alternative transit methods. Therefore, the Project would not conflict with this policy.
Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.	**No Conflict.** The Project's location, land use characteristics, and Project design features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be consistent with the relevant SCAG growth projections in the SCAG 2020–2045 RTP/SCS which were used in preparing the 2022 AQMP. The Project includes bicycle parking spaces for the proposed uses as required by the

Table IV.B-4 (Continued)
Project Consistency with City of Los Angeles General Plan (Air Quality Element)

Goals, Objectives, and Policies	Analysis of Project Consistency
	LAMC. The Project would provide preferential parking for carpools and low-emitting and zero emission vehicles. The Project would comply with applicable City and CALGreen EVSE charging requirements, which includes 10 percent of the overall residential spaces and 20 percent of the overall non-residential spaces equipped with EVSE to support EV charging stations. Further, the Project would include solar-ready infrastructure to allow for future solar power generation, such as photovoltaic (PV) panels on rooftops of the podium on the South Parcel and Courtyard Building on the North Parcel, with precise locations to be determined. The Project would also comply with Ordinance No. 187,714, which requires all newly constructed buildings to be all electric, excluding the proposed restaurant uses. Therefore, the Project would not conflict with this policy.
Objective 5.1: It is objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments. **Policy 5.1.2:** Effect a reduction in energy consumption and shift to non-polluting sources of energy in its building and operations.	**No Conflict.** The Project's location, land use characteristics, and Project design features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be consistent with the relevant SCAG growth projections in the SCAG 2020–2045 RTP/SCS which were used in preparing the 2022 AQMP. The Project includes bicycle parking spaces for the proposed uses as required by the LAMC and is well served by transit. Moreover, the Project would provide preferential parking for carpools and low-emitting and zero emission vehicles. The Project would comply with applicable City and CALGreen EVSE charging requirements. Further, the Project would include solar-ready infrastructure to allow for future solar power generation, such as photovoltaic (PV) panels on rooftops of the podium on the South Parcel and Courtyard Building on the North Parcel, with precise locations to be determined. The Project would also comply with Ordinance No. 187,714, which requires all newly constructed buildings to be all electric, excluding the proposed restaurant.
Objective 5.3: It is the objective of the City of Los Angeles to reduce the use of polluting fuels in stationary sources. **Policy 5.3.1:** Support the development and use of equipment powered electric or low-emitting fuels.	**No Conflict.** During operations, the Project would comply with the CARB Small Offroad Engine (SORE) regulations which ban the sale of combustion powered landscaping equipment starting in 2024 and small combustion powered stationary generators starting in 2028. Therefore, the Project would not conflict with this policy.

Source: Eyestone Environmental, 2025.

Based on the above, the Project is consistent with applicable policies of the City of Los Angeles Air Quality Element. Refer to Section IV.I, Land Use and Planning, of this Draft EIR, for an analysis of the Project's consistency with the City's General Plan.

(c) Conclusion

In conclusion, analysis of Threshold (a) was based on the Project's consistency with the AQMP as well as the City of Los Angeles plans and policies. The determination of AQMP consistency is primarily based on the long-term impacts of the Project on air quality in the Air Basin. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project is consistent with growth projections that form the basis of the 2022 AQMP, the Project would be consistent with the emissions forecasts in the AQMP. Furthermore, the Project would comply with all applicable regulatory standards and the project design features identified in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR, that would serve to reduce the criteria air pollutants discussed herein. Additionally, as the Project would support the City of Los Angeles and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures. **Thus, the Project would not conflict with or obstruct implementation of the AQMP. With regard to the City of Los Angeles policies, as discussed above, the Project would serve to implement applicable policies of the City of Los Angeles pertaining to air quality. Based on the above, impacts to Threshold (a) would be less than significant.**

(2) Mitigation Measures

Impacts related to the Project's potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to Threshold (a) during construction and operation of the Project would be less than significant without mitigation.

Threshold (b): Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

(1) Impact Analysis

(a) Regional Emissions

(i) Construction

Construction of the Project would be phased, with development of the South Parcel occurring as Phase 1 and development of the North Parcel occurring as Phase 2. Phase 1 is anticipated to start construction in March 2028 and end in February 2031. Phase 2 would be constructed soon after, or within a few years following completion of Phase 1, depending on market demand. For the purposes of providing a conservative analysis in the Draft EIR, Phase 2 is assumed to begin in the February 2031 after completion of Phase 1 and end in February 2034.[93] Each phase of construction would occur in sequential subphases (e.g., demolition, structural upgrades, grading, building construction). Construction of the Project would commence with demolition of the existing structures to be removed. This phase would be followed by grading and excavation for the parking garage and footings, which would extend to a maximum depth of approximately 51 feet below ground surface (bgs) for the South Parcel and 49 feet bgs for the North Parcel . The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Grading activities would require approximately 11,531 cubic yards of import with 85,196 cubic yards of export to be hauled to a landfill due to grading during Phase 1 and would require approximately 16,847 cubic yards of import with 152,168 cubic yards of export during Phase 2. The total import would be approximately 28,378 cubic yards and export would be 237,364 cubic yards.

Construction of the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from haul trucks and construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment, such as dozers, loaders, and cranes. During the finishing phase of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Construction assumptions, including construction schedule, heavy-duty construction

[93] *The analysis assumes a construction start date of January 2031 for Phase 2, which represents the earliest date construction would initiate. Assuming that construction would commence on the earliest possible start date represents the worst-case scenario for criteria air pollutant emissions, as equipment and vehicle emission factors for later years would be slightly less than for earlier years due to the progressive imposition of more stringent standards for off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles with newer and more efficient models over time.*

equipment mix, and the number of worker and delivery and haul truck trips, are included in Appendix B (CalEEMod Construction Output file) of this Draft EIR.

The emissions levels in Table IV.B-5 on page IV.B-62 represent the highest daily emissions projected to occur during each year of construction. As presented in Table IV.B-5, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the SCAQMD daily significance thresholds for VOC, NO_X, CO, SO_X, $PM_{10,}$ or $PM_{2.5}$. Therefore, regional construction emissions resulting from the Project would result in a less-than-significant impact.

(ii) Operation

As discussed above, SCAQMD's CalEEMod was used to calculate area-, energy-, mobile-, and stationary-source emissions. For purposes of the air quality analysis, project characteristics incorporated in this analysis include the Project Site's increase in accessibility to transit and increase in diversity of uses. These project design features are explained further in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR.

Table IV.B-6 on page IV.B-63 provides the Project's operational emissions. As shown in Table IV.B-6, regional emissions resulting from operation of the Project would not exceed any of SCAQMD's daily regional operational thresholds. Therefore, regional operational emissions resulting from the Project would result in a less-than-significant impact.

(b) Localized Emissions

As previously discussed, SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the Project Site as a result of Project construction and operations. The thresholds are based on applicable short-term state and federal ambient air quality standards.

(i) Construction

Project-related localized construction impacts are evaluated based on SCAQMD LST methodology, which takes into account ambient pollutant concentrations. Based on SCAQMD methodology, localized emissions, which exceed LSTs, would also cause an exceedance of ambient air quality standards. As analyzed in Threshold (c) below, Project-related construction emissions would not exceed localized thresholds. Thus, localized construction emissions resulting from the Project would not exceed air quality standards. Therefore, localized construction emissions resulting from the Project would result in a less-than-significant air quality impact.

Table IV.B-5
Estimate of Maximum Regional Project Daily Construction Emissions-Unmitigated (pounds per day)[a,b]

Construction Year	VOC[c]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Construction Emissions Winter						
Year 2028 (Phase 1-South Parcel)	5	31	73	<1	12	3
Year 2029 (Phase 1-South Parcel)	4	24	58	<1	11	3
Year 2030 (Phase 1-South Parcel)	22	22	55	<1	12	3
Year 2031 (Phase 2-North Parcel)	22	34	53	<1	12	3
Year 2032 (Phase 2-North Parcel)	2	14	31	<1	7	2
Year 2033 (Phase 2-North Parcel)	17	18	39	<1	8	2
Year 2034 (Phase 2-North Parcel)	17	17	38	<1	8	2
Maximum Unmitigated Construction Emissions[c]	22	34	73	<1	12	3
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(53)**	**(66)**	**(477)**	**(150)**	**(138)**	**(52)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Regional Construction Emissions Summer						
Year 2028 (Phase 1-South Parcel)	5	42	78	<1	12	3
Year 2029 (Phase 1-South Parcel)	3	18	51	<1	11	3
Year 2030 (Phase 1-South Parcel)	21	17	54	<1	12	3
Year 2031 (Phase 2-North Parcel)	3	35	47	<1	10	3
Year 2032 (Phase 2-North Parcel)	2	14	33	<1	7	2
Year 2033 (Phase 2-North Parcel)	16	14	31	<1	7	2
Maximum Unmitigated Construction Emissions[c]	21	42	78	<1	12	3
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(54)**	**(58)**	**(472)**	**(150)**	**(138)**	**(52)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR.*

[b] *Unmitigated scenario assumes compliance with SCAQMD Rule 403 requirements for fugitive dust. Dust control measures include watering three times daily and properly securing soil exporting loads prior to transport.*

[c] *Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic gases (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.*

Source: Eyestone Environmental, 2025.

Table IV.B-6
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout (2034)[a]

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Winter						
Area	26	<1	<1	<1	<1	<1
Energy (Natural Gas)[b]	<1	<1	<1	<1	<1	<1
Mobile	14	9	94	<1	27	7
Stationary (Emergency Generators)	2	7	6	<1	<1	<1
Total Proposed Uses Emissions	**43**	**16**	**101**	**<1**	**27**	**7**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(12)**	**(39)**	**(449)**	**(150)**	**(123)**	**(48)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Summer						
Area	36	<1	84	<1	<1	<1
Energy (Natural Gas)[b]	<1	<1	<1	<1	<1	<1
Mobile	14	8	100	<1	27	7
Stationary (Emergency Generators)	2	7	6	<1	<1	<1
Total Proposed Uses Emissions	**52**	**16**	**191**	**<1**	**27**	**7**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(3)**	**(39)**	**(359)**	**(150)**	**(123)**	**(48)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR.*

[b] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates and account for the all-electric buildings in compliance with Ordinance 187,714. The Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and is consistent with the requirements of Ordinance No. 187,714.*

Source: Eyestone Environmental, 2025.

(ii) Operation

Project-related operational emissions were also evaluated based on SCAQMD LST methodology from on-site sources (e.g., emergency generators, cooking appliances in restaurants). The potential to cause or contribute to CO hotspots (potential exceedances of ambient air quality standards) from post-construction motor vehicle operations was also evaluated. As analyzed in Threshold (c) below, Project-related operational emissions from on-site and off-site sources would not exceed localized thresholds. Thus, localized operational emissions resulting from operation of the Project would not violate any air quality

standard or contribute substantially to an existing or projected air quality violation. Therefore, localized operational emissions resulting from the Project would result in a less-than-significant air quality impact.

(c) Concurrent Construction and Operational Emissions

The South Parcel of the Project Site will be completed in 2031 and occupied, while the North Parcel would be under construction from 2031 to 2033. Therefore, concurrent construction of the North Parcel and operational impacts of the South Parcel in 2031 were evaluated. This development scenario results in the maximum amount of operational activity in terms of square footage developed on the Project Site and resultant daily vehicle trips (3,763 daily trips) (i.e., Completion of South Parcel).[94] This development scenario also conservatively assumes maximum daily activity (i.e., peak grading/excavation on-site heavy-duty construction equipment usage and 180 haul truck trips) occurring during construction of the remaining portion of the Project Site. Further, the concurrent construction and operation scenario is analyzed against the more stringent operational emissions thresholds for a more conservative analysis. Additional details regarding concurrent construction and operational land uses are provided in Appendix B of this Draft EIR.

As summarized in Table IV.B-7 on page IV.B-65, concurrent construction and operational regional emissions would not exceed the SCAQMD regional operation thresholds. Localized emissions were also calculated during a concurrent construction and operational scenario, and as shown in Table IV.B-7 localized emissions would not exceed the SCAQMD localized construction thresholds.

(d) Conclusion

According to SCAQMD guidance, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would have a cumulatively considerable contribution to emissions for those pollutants for which the Air Basin is in non-attainment. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.[95] As shown in Table IV.B-5 and Table IV.B-6 on pages IV.B-62 and IV.B-63, respectively, Project construction and operational daily emissions at the Project Site would not exceed any of SCAQMD's regional thresholds. Similarly, construction and operational emissions from the Project would not exceed any of SCAQMD's localized significance thresholds at Project buildout as shown in Table IV.B-8 and Table IV.B-9 on pages IV.B-66 and IV.B-67, respectively. Thus,

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[94] *Gibson, Supplemental Transportation Assessment for the Buena Vista Project, Los Angeles, California, August 14, 2024.*

[95] *SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003, Appendix D.*

Table IV.B-7
Estimate of Maximum Regional Project Daily Concurrent (Year 2031) Operation and Construction Emissions—Unmitigated (pounds per day)[a,b]

Emission Source	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Winter Emissions						
Regional Operational Emissions	28	11	69	<1	17	5
Regional Construction Emissions	17	34	53	<1	12	3
Total Proposed Project Regional Overlap	**45**	**45**	**122**	**<1**	**29**	**8**
SCAQMD Operational Thresholds	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Regional Summer Emissions						
Regional Operational Emissions	34	11	126	<1	17	5
Regional Construction Emissions	16	35	47	<1	10	3
Total Proposed Project Regional Overlap	50	46	173	<1	27	8
SCAQMD Operational Thresholds	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Winter Emissions						
Localized Operational Emissions	N/A	5	5	N/A	<1	<1
Localized Construction Emissions	N/A	15	28	N/A	2	1
Total Proposed Project Localized Overlap	**N/A**	**21**	**32**	**N/A**	**2**	**<1**
SCAQMD Localized Significance Thresholds[c]	N/A	120	1,861	N/A	16	8
Exceed Threshold?	N/A	No	No	N/A	No	No
Localized Summer Emissions						
Localized Operational Emissions	N/A	6	58	N/A	<1	<1
Localized Construction Emissions	N/A	15	28	N/A	4	<1
Total Proposed Project Localized Overlap	**N/A**	**21**	**86**	**N/A**	**4**	**1**
SCAQMD Localized Significance Thresholds[c]	N/A	120	1,861	N/A	16	8
Exceed Threshold?	N/A	No	No	N/A	No	No

Numbers may not add up exactly due to rounding.

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR.*

[b] *Unmitigated emissions assumes compliance with SCAQMD Rule 403, which is a requirement for construction projects within the South Coast Air Basin. While the measure is not considered mitigation, CalEEMod includes the measure under mitigation measures and, therefore, is reflected in the "mitigated" results within the CalEEMod output file.*

[c] *Potential localized construction impacts were conservatively evaluated using SCAQMD's LSTs for Source Receptor Area 1 for a 5-acre site to represent the entire Project Site. This accounts for construction of Phase 2-North Parcel which is approximately 4.0 acres and the predominant source of emissions combined with limited operational emissions from the Phase 1-South Parcel (approximately 3.9 acres). The closest sensitive receptor is comprised of adjacent residential uses north of the Project Site. The localized threshold is based on a 25-meter receptor distance which is the closest receptor distance on the SCAQMD mass rate LST look-up table.*

Source: Eyestone Environmental, 2025.

Table IV.B-8
Estimate of Maximum Localized Daily Project Construction Emissions–Unmitigated
(pounds per day)[a, b]

Construction Year	NO_X	CO	PM_{10}	$PM_{2.5}$
Winter				
Year 2028 (Phase 1-South Parcel)	26	39	2	1
Year 2029 (Phase 1-South Parcel)	18	27	1	<1
Year 2030 (Phase 1-South Parcel)	16	22	1	<1
Year 2031 (Phase 2-North Parcel)	15	28	2	<1
Year 2032 (Phase 2-North Parcel)	11	16	<1	<1
Year 2033 (Phase 2-North Parcel)	14	22	1	<1
Year 2034 (Phase 2-North Parcel)	14	22	1	<1
Maximum Unmitigated Daily Localized Emissions	**26**	**39**	**2**	**1**
SCAQMD Localized Significance Thresholds[c]	**104**	**1,554**	**13**	**7**
Over/(Under)	**(78)**	**(1,515)**	**(11)**	**(6)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Summer				
Year 2028 (Phase 1-South Parcel)	26	39	4	1
Year 2029 (Phase 1-South Parcel)	12	16	1	<1
Year 2030 (Phase 1-South Parcel)	12	16	1	<1
Year 2031 (Phase 2-North Parcel)	15	28	4	<1
Year 2032 (Phase 2-North Parcel)	11	16	<1	<1
Year 2033 (Phase 2-North Parcel)	11	16	<1	<1
Maximum Unmitigated Daily Localized Emissions	**26**		**4**	**<1**
SCAQMD Localized Significance Thresholds[c]	**104**	**1,554**	**13**	**7**
Over/(Under)	**(78)**	**(1,515)**	**(9)**	**(6)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *The CalEEMod model printout sheets and calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR.*

[b] *Unmitigated emissions assumes compliance with SCAQMD Rule 403, which is a requirement for construction projects within the South Coast Air Basin. While the measure is not considered mitigation, CalEEMod includes the measure under mitigation measures and, therefore, is reflected in the "mitigated" results within the CalEEMod output file.*

[c] *Potential localized construction impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 1 for a 3.9-acre site (Phase 1-South Parcel is approximately 3.9 acres and Phase 2-North Parcel is approximately 4.0 acres) which utilizes a linear interpolation between the 2-acre and 5-acre thresholds. The closest existing sensitive receptor are residential uses adjacent to the Project Site. The localized threshold is based on a 25-meter receptor distance which is the closest receptor distance on the SCAQMD mass rate LST look-up table.*

Source: Eyestone Environmental, 2025.

Table IV.B-9
Estimate of Maximum Localized Project Daily Operational Emissions—At Project Buildout (2034)
(pounds per day)[a]

Emission Source	Pollutant Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Project (Buildout) Winter				
Area	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Stationary (Emergency Generators)	7	6	<1	<1
On-Site Total	**8**	**7**	**<1**	**<1**
SCAQMD Significance Threshold[c,d]	**120**	**1,861**	**4**	**2**
Over/(Under)	**(112)**	**(1,854)**	**(4)**	**(2)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Project (Buildout) Summer				
Area	<1	84	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Stationary (Emergency Generators)	7	6	<1	<1
On-Site Total	**8**	**91**	**<1**	**<1**
SCAQMD Significance Threshold[c,d]	**120**	**1,861**	**4**	**2**
Over/(Under)	**(112)**	**(1,770)**	**(4)**	**(2)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR.*

[b] *The Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and is consistent with the requirements of Ordinance No. 187,714.*

[c] *Potential localized construction impacts were conservatively evaluated using SCAQMD's LSTs for Source Receptor Area 1 for a 5-acre site to represent to represent the entire Project Site. This accounts for construction of Phase 2-North Parcel which is approximately 4.0 acres and the predominant source of emissions combined with limited operational emissions from the Phase 1-South Parcel (approximately 3.9 acres). The closest sensitive receptor is a residential use adjacent to the Project Site. The localized threshold is based on a 25-meter receptor distance which is the closest receptor distance on the SCAQMD mass rate LST look-up table*

[d] *Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. In addition, SCAQMD does not provide an LST for SO_2 since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant.*

Source: Eyestone Environmental, 2025.

construction and operation of the Project would have less-than-significant impacts with regard to regional and localized emissions. **Therefore, the Project's contribution to**

regional and localized cumulative air quality impacts would not be cumulatively considerable and, thus, would be less than significant. As such, impacts to Threshold (b) would be less than significant.

(2) Mitigation Measures

Project-level impacts related to Threshold (b) would be less than significant during construction and operation of the Project. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to Threshold (b) during both construction and operation of the Project were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (c): Would the Project expose sensitive receptors to substantial pollutant concentrations?

(1) Impact Analysis

(a) Construction

(i) On-Site Construction Activities (Criteria Pollutants)

As discussed above in the methodology subsection, the localized construction air quality analysis was conducted using the methodology promulgated by SCAQMD. Look-up tables provided by SCAQMD were used to determine localized construction emissions thresholds for the Project.[96]

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2021–2023) for the Project area, as presented in Table IV.B-8 on page IV.B-66. Although the trend shown in Table IV.B-8 demonstrates that ambient air quality is improving in the area, the localized construction emissions analysis conservatively did not apply a reduction in background pollutant concentrations for subsequent years of construction (i.e., 2028–2034). By doing so, the allowable pollutant increment to not exceed an ambient air quality standard is more stringent. The analysis and LSTs take into account existing

[96] *SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.*

background ambient air quality monitoring data (2021–2023). Calculations of the LSTs are provided in Appendix B of this Draft EIR.

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for SRA 1 based on a 3-acre portion of the Project Site. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residential uses located to the north, adjacent to the Project Site along Broadway. Ambient air quality standards for NO_x and CO have averaging times of 1-hour and 8-hour respectively. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters. Based on SCAQMD LST methodology, projects with boundaries located closer than 25 meters to the nearest receptor (such as the Project) should use the LSTs for receptors located at 25 meters.[97]

The maximum daily localized emissions from Project construction and LSTs are presented in Table IV.B-9 on page IV.B-67. As presented in Table IV.B-9, maximum construction emissions would not exceed the SCAQMD localized screening thresholds. Therefore, on-site construction activities would not expose sensitive receptors to substantial pollutant concentrations and impacts with regard to localized emissions would be less than significant.

(ii) Off-Site Construction Activities (CO "Hot Spots" Analysis)

Consistent with the CO methodology above, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

The highest average daily trips at an intersection under the Existing Condition would be approximately 77,000 vehicles per day at the Broadway and Cesar Chavez Avenue intersection.[98] Project construction would result in a maximum of 60 worker trips and up to 479 haul trips per day during the mat foundation phase of construction. Please refer to Appendix B of this Draft EIR for detailed construction assumptions.

Conservatively assuming that all of the Project construction would drive through this intersection, it would result in approximately 79,190 vehicles per day (ambient and Project construction trips), which is lower than the daily traffic volumes of 400,000 vehicles per day

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[97] *SCAQMD, Final Localized Significance Threshold Methodology, revised July 2008.*

[98] *Daily trips calculated based on Caltrans K factors for the nearest freeway monitoring station. Details are provided in Appendix B of this Draft EIR.*

that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[99] This daily trip estimate is based on the peak hour conditions of the intersection. The Project's off-site construction activities, including the highest daily trips, would not expose sensitive receptors to substantial CO concentrations. As a result, Project impacts related to localized construction mobile-source CO emissions are considered less than significant.

(iii) Off-Site Construction Activities (TACs)

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk, which is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the Project's short-term construction schedule of approximately 36 months for each phase of construction, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, SCAQMD's CEQA guidance does not require a health risk assessment (HRA) for short-term construction emissions.[100] Therefore, based on SCAQMD's CEQA guidance, a quantitative evaluation of the Project's long-term cancer impacts from construction activities is not required since the Project's construction activities would occur over a relatively short duration. As such, the Project's construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations due to the limited construction duration which is not considered a long term (i.e., 70-year) source of TAC emissions. Project-related TAC impacts during construction would be less than significant.

(b) Operation

(i) On-Site Operational Activities (Criteria Pollutants)

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table IV.B-9 on page IV.B-67. The SCAQMD LST mass rate look-up tables were used to evaluate potential localized impacts. As shown in Table IV.B-9, on-site operational emissions would not exceed any of the LSTs. The Project's on-site operational activities, including generation of criteria pollutants, would not exceed any of the LSTs and therefore not expose sensitive receptors to substantial pollutant concentrations. Therefore,

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[99] *Values are presented as passenger car equivalents (PCE). Trucks are assumed to be equivalent to 2.5 passenger cars. Daily trips calculated based on Caltrans K factors for the nearest freeway monitoring station. Details are provided in Appendix B of this Draft EIR.*

[100] *SCAQMD, CEQA Air Quality Handbook, April 1993, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants).*

localized operational emissions resulting from the Project would result in a less-than-significant air quality impact.

(ii) Off-Site Operational Activities (CO "Hot Spots" Analysis)

Consistent with the CO methodology above, if a project intersection does not exceed 400,000 vehicles per day, then the project does not meet the threshold to prepare a detailed CO hot spot analysis.

At buildout of the Project, the highest average daily trips at an intersection would be approximately 104,000 vehicles per day (ambient and project) at the Broadway and Cesar Chavez Avenue,[101] which is lower than the daily traffic volumes of 400,000 vehicles per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[102] This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Broadway and Cesar Chavez Avenue intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. In addition, CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP primarily due to ongoing fleet turnover of older on-road light duty vehicles and use of cleaner fuels.[103] In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2018.[104] Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. The supporting data for this analysis is included in Appendix B of this Draft EIR. The Project's off-site operational activities, including the highest average daily trips, would not expose sensitive receptors to substantial CO concentrations as the intersection with the highest average daily is below 400,000 vehicles per day. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

(iii) Toxic Air Contaminants

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the *Air Quality and Land Use Handbook: A Community Health*

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[101] *Daily trips calculated based on Caltrans K factors for the nearest freeway monitoring station and peak hour traffic through the intersection for Project plus existing conditions. Details are provided in Appendix B of this Draft EIR.*

[102] *The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.*

[103] *SCAQMD, Carbon Monoxide Redesignation Request and Maintenance Plan, February 2005.*

[104] *SCAQMD, 2018 Air Quality Data Table.*

Perspective, (CARB Land Use Handbook), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[105] SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.[106] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations is DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent facility operations (e.g., emergency generators). However, these activities and the land uses associated with the Project are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It should be noted that SCAQMD recommends that HRAs be conducted for substantial individual sources of diesel particulate matter (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions. The Project primarily includes residential, office and retail/restaurant uses, which would not be expected to generate a large number of heavy-duty truck trips. The Project total truck deliveries during operations, including both diesel and non-diesel, would be approximately 25 new daily truck deliveries.

The Project would only result in minimal emissions of air toxics from the use of consumer products and landscape maintenance activities, among other things. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the Project. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds and would not warrant further study under the California Accidental Release Program (CalARP).

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic emissions or TACs that exceed the maximum incremental

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[105] *CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.*

[106] *SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.*

cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

(c) Concurrent Construction and Operational Emissions

As discussed above, the South Parcel of the Project Site will be completed in 2031 and occupied, while the North Parcel would be under construction from 2031 to 2034. Therefore, concurrent construction of the North Parcel and operational impacts of the South Parcel in 2031 were evaluated. As summarized in Table IV.B-7 on page IV.B-65, concurrent construction and operational localized emissions would not exceed the SCAQMD localized construction thresholds.

Based on the above, the Project's on- and off-site construction and operational emissions would not exceed the SCAQMD localized screening thresholds. Similarly, the Project's TAC emissions would not exceed SCAQMD thresholds. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts to Threshold (c) would be less than significant.

(2) Mitigation Measures

Project-level impacts related to Threshold (c) would be less than significant during construction and operation of the Project. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to Threshold (c) during construction and operation of the Project were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): Would the Project result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

As discussed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR, the Project would not create or result in other emissions, such as those leading to objectionable odors, that may impact a substantial number of people. **Thus, the Project would have a less than significant impact with respect to Threshold (d). No further analysis of this issue is required.**

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2034, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program would continue to provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement.

From a construction standpoint, the overall amount of demolition, excavation/export, and square footage of building construction would not change. Thus, the use and types of equipment required for construction would be similar to that associated with a 2034 buildout. However, a long-term buildout would benefit from future improvements in equipment efficiencies, including more stringent regulatory requirements, that would reduce future air emissions during Project construction. Specifically, based on SCAQMD factors, the construction equipment and truck fleet mix would emit less pollution in future years due to more stringent emissions control regulations. As construction air quality impacts are evaluated on a worst-case day, the shorter construction duration (2028–2034) would assume more intensive activities on a daily basis, as well as overlapping activities and construction phases. Therefore, as a conservative assumption, it was assumed that construction would be completed by 2034.

From an operational standpoint, a long-term buildout would also result in an overall reduction in operational emissions due to more stringent requirements in the future. As an example, Title 24 requirements apply to projects based on the date when a building permit is issued. Thus, buildings constructed at a later date would be required to comply with subsequent versions of Title 24, which typically include increasingly stringent energy conservation requirements and associated reductions in energy use.[107] In addition, Governor Gavin Newsom signed Executive Order No. N-79-20 on September 23, 2020, which will phase out sales of new gas-powered passenger cars in California by 2035, with an additional 10-year transition period for heavy vehicles. With more stringent fuel economy requirements in subsequent years, fuel usage associated with the Project would similarly decrease. As such, a long-term buildout would reduce the Project's operational emissions.

Consistent with the Project, extending the full buildout year to approximately 2047 also has the potential to result in concurrent construction and operational activities. As discussed above, the South Parcel of the Project Site will be completed in 2031 and

[107] *For example, single-family homes built with the 2019 Title 24 Standards are estimated to use approximately seven percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once the mandated rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. Nonresidential buildings are projected to use approximately 30 percent less energy than 2016 standards due mainly to lighting upgrades.*

occupied, while the North Parcel would be under construction from 2031 to 2033. As summarized in Table IV.B-7 on page IV.B-65, concurrent construction and operational regional emissions would not exceed the SCAQMD regional thresholds. Localized emissions were also calculated during a concurrent construction and operational scenario, and as shown in Table IV.B-7 on page IV.B-65 localized emissions would not exceed the SCAQMD localized thresholds. A later buildout date would not change the overlap of construction and operational activities and as such a long-term buildout would reduce the Project's concurrent construction and operational emissions for the reasons stated above. A later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

The following cumulative impacts analysis is based on the recommendations included in SCAQMD's *CEQA Air Quality Handbook*. According to SCAQMD, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

(a) Construction

As discussed under Thresholds (b) and (c) above, the Project's construction-related air quality emissions and cumulative impacts would be less than significant. The Project would comply with regulatory requirements, including the SCAQMD Rule 403 requirements listed above. Based on SCAQMD guidance, individual construction projects that exceed the recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of SCAQMD's regional or localized significance thresholds, including NO_X, CO, PM_{10} and $PM_{2.5}$, and/or TACs. **Therefore, the Project's contribution to cumulative air quality impacts due to regional and localized emissions would not be cumulatively considerable and, therefore, would be less than significant.**

(b) Operation

As discussed above, the Project's regional operational air quality emissions, localized emissions, and TACs would be less than significant. According to SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a

cumulatively considerable net increase of these criteria pollutants.[108] As operational emissions did not exceed any of SCAQMD's regional or localized significance thresholds, the emissions of non-attainment pollutants and precursors generated by project operation would not be cumulatively considerable.

With respect to TAC emissions from Project operation, neither the Project nor any of the 25 related projects (which are largely residential, retail/commercial, and office in nature), would represent a substantial source of TAC emissions. Substantial TAC emissions are typically associated with large-scale industrial, manufacturing, and transportation hub facilities, which are subject to SCAQMD permitting and best available control technology (BACT) requirements to limit pollutant emissions. The Project and the related projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. However, the Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. Pursuant to AB 1807, which directs CARB to identify substances as TACs and adopt airborne toxic control measures to control such substances, SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, as discussed above, the Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines and thus, would not contribute to a cumulative impact.

Therefore, during operation, the Project would not result in a significant cumulative impact to air quality as the Project's contribution to regional, localized, and TAC emissions would not be cumulatively considerable.

(2) Mitigation Measures

Cumulative impacts with regard to air quality would be less than significant, during construction and over the long-term operating life of the Project. Therefore, no mitigation measures are required.

[108] *SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003, Appendix D.*

(3) Level of Significance After Mitigation

Cumulative impacts with regard to air quality during both construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.