IV. Environmental Impact Analysis

IV. Environmental Impact Analysis

A. 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, 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 September 14, 2023.*

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.A-1 on page IV.A-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.A-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	12 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
	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[e]	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

[a] *An ambient air quality standard is a concentration level expressed in either ppm or µg/m3and 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 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.*

Table IV.A-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]

[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] *An attainment re-designation request is pending.*

Source: USEPA, NAAQS Table, www.epa.gov/criteria-air-pollutants/naaqs-table, accessed June 24, 2024; CARB, Ambient Air Quality Standards May 4, 2016.

The Air Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high. 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 nitrogen oxide (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 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 solvents.[9] Short-term health effects 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

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[4] *CARB, Hydrogen Sulfide & Health, 2019, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed September 14, 2023.*

[5] *CCARB, Hydrogen Sulfide & Health, 2019.*

[6] *CARB, Hydrogen Sulfide & Health, 2019.*

[7] *CARB, Visibility-Reducing Particles and Health, ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed September 14, 2023.*

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

[9] *CARB, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed September 14, 2023.*

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 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.

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

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

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
- 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

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

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.A-1 on page IV.A-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.

(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

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[13] *USEPA, Summary of the Clean Air Act, www.epa.gov/laws-regulations/summary-clean-air-act, accessed July 14, 2024.*

[14] *USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, last updated May 3, 2023, www.epa.gov/clean-air-act-overview/clean-air-act-text, accessed September 14, 2023. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.*

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.A-1 on page IV.A-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.A-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 5 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) 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 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 builds upon measures already in place from previous AQMPs

[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).*

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 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 2020 AQMP, are based on the 2020–2045 RTP/SCS, which was adopted on September 3, 2020. The 2020–2045 RTP/SCS was determined to conform to the federally mandated SIP for the attainment and maintenance of NAAQS standards. On October 30, 2020, CARB accepted SCAG's determination that the SCS met the applicable future state GHG reduction targets of 19 percent.

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

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[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.*

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]

It is noted that 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. Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with investment, policies and strategies for achieving the region's shared goals through 2050. The Plan elements are organized within the pillars of Mobility, Communities, Environment and Economy. While Connect SoCal 2024 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 top-line goals are: Mobility (build and maintain an integrated multimodal transportation network; Communities (develop, connect and sustain communities that are livable and thriving; 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 residents). The 2022 AQMP incorporates SCAG's 2020–2045 RTP/SCS. As such, SCAG's 2020–2045 RTP/SCS is considered herein with regards to air quality impacts.

(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 *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

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

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

[22] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#, accessed September 14, 2023.*

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 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:

- **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.

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[23] *SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 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 PM 2.5 Significance Thresholds, 2006.*

- **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.

- **Rule 316—**The purpose of Rule 316 (PR 316) is to act as a companion rule to Rule 2305 (PR 2305)—Warehouse Indirect Source Rule—Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. PR 2305 requires reporting information about facility operations and recordkeeping. PR 316 establishes the administrative fees that PR 2305 warehouse operators and owners must pay in order to recover SCAQMD administrative costs associated with ensuring compliance with PR 2305 (see also Rule 2305).

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.

- **Rule 2305—Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program:** This rule requires warehouses greater than 100,000 square feet to directly reduce NO_x and diesel PM, or to facilitate emission and exposure reductions of these pollutants. The WAIRE Program is a menu-based points system that will require warehouse operators to annually earn a specified number of points by completing actions from a menu. Menu items include acquiring or using Near Zero Emissions (NZE) and/or Zero Emissions (ZE) on-road trucks, ZE cargo handling equipment, ZE charging/fueling infrastructure, solar panels, or

particulate filters for nearby sensitive land uses. Alternatively, warehouse operators could prepare and implement a custom plan specific to their site, or they could pay a mitigation fee. Funds from the mitigation fee would be used through future solicitations and Board actions to incentivize the purchase of NZE or ZE trucks and ZE charging/fueling infrastructure in the communities near warehouses that paid the fee. Warehouse owners and operators would also have reporting and recordkeeping requirements.

(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, Mobility 2035, 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 related 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-occupancy 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 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 impacts 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 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.

(a) 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, and laboratories, is 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 have demonstrated an exceedance for Pb (lead) 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 nitrogen oxide (NO_X) emissions[26] sufficiently to meet the upcoming ozone standard deadlines. The 2022 AQMP provides a baseline year 2018 inventory of 351 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 the region, an additional 67 percent reduction from the baseline year of 2018 in the year 2037 is necessary to attain the 8-hour ozone 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 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. In addition, 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 portions of the AQMP. SCAQMD combines its portion of the AQMP with those prepared by SCAG. The RTP/SCS and Transportation Control Measures (TCMs), included as Appendix IV-C of the 2022 AQMP for the 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 has improved substantially over the years, primarily due to the impacts of air quality control

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

[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, 2022 AQMP, 2022 (p. ES-4 2022 AQMP).*

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

programs at the local, state and federal levels. Figure IV.A-1 on page IV.A-24 shows the percent change in air quality along with demographic data for the four-county region from the 2022 AQMP. In particular, Figure IV.A-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 an Air Basin-wide air toxics study (MATES-V).[31] The MATES-V study was aimed at estimating the cancer risk from toxic air emissions throughout the Air 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. 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 diesel particulate emissions, 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] Generally, the risk from

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

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 V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=view_38, accessed September 14, 2023.*

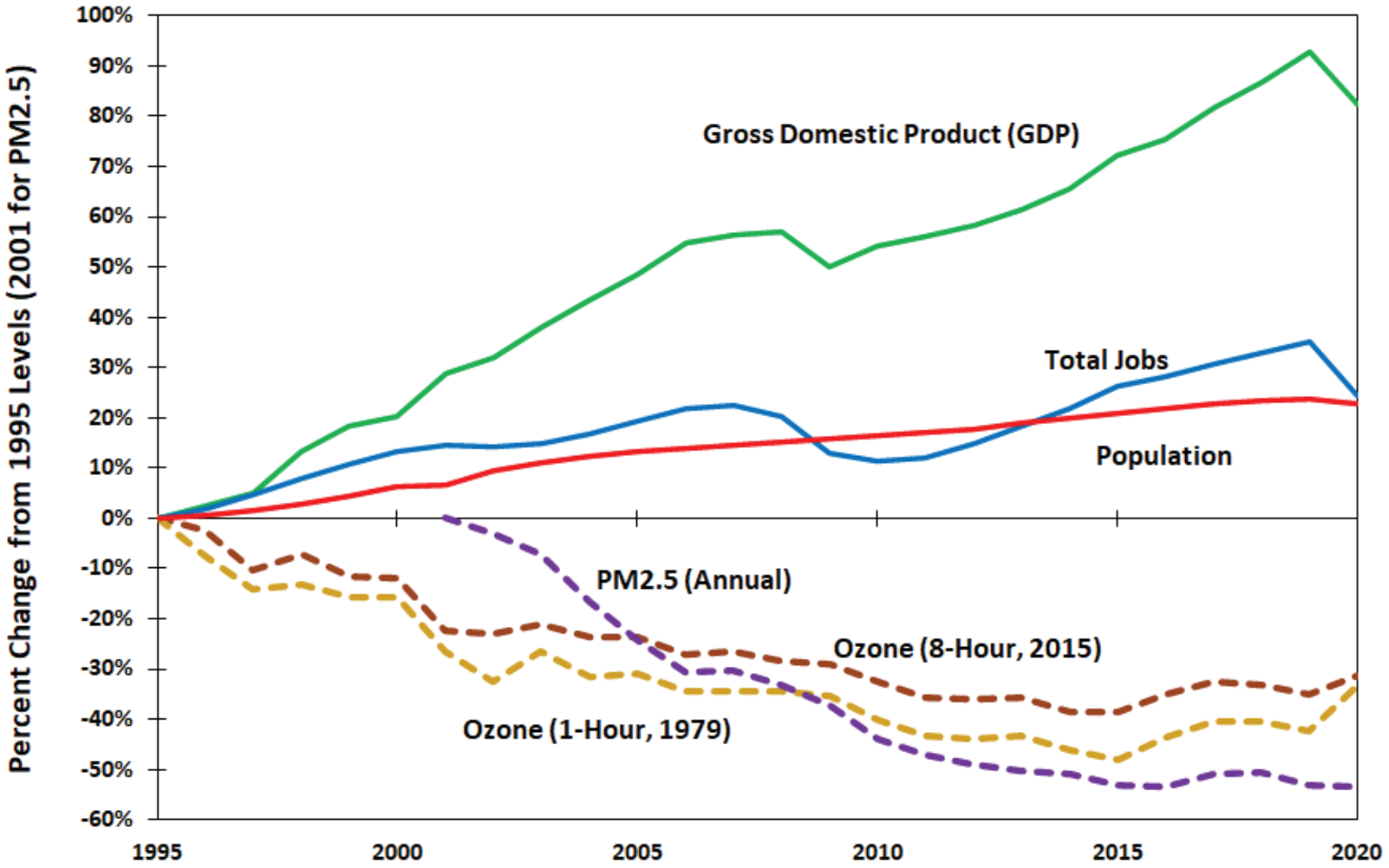

Figure IV.A-1
2022 AQMP Ozone Trends

Source: AQMP, 2022.

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) in which 31 monitoring stations operate. Figure IV.A-2 on page IV.A-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 2.0 miles north 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.A-2 on page IV.A-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 2020–2022.

(b) Existing Health Risk in the Surrounding Area

As shown in Figure IV.A-3 on page IV.A-29, based on the MATES-V model, the calculated cancer risk in the Project area is approximately 793 in one million.[34] The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., US-101, I-5, and I-10). In general, the risk at the Project Site is comparable with other urbanized areas in Los Angeles.

(c) Surrounding Uses

The land uses surrounding the Project Site include a mix of commercial, retail, industrial, restaurant, and residential uses. Restaurant, hotel and residential uses are located west of the Project Site. To the north of the Project Site, across 6th Street, is property zoned as M3-1-RIO, including a mixture of one-, two-, and three-story buildings with a variety

[34] *SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), MATES V Interactive Carcinogenicity Map, 2021.*

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.

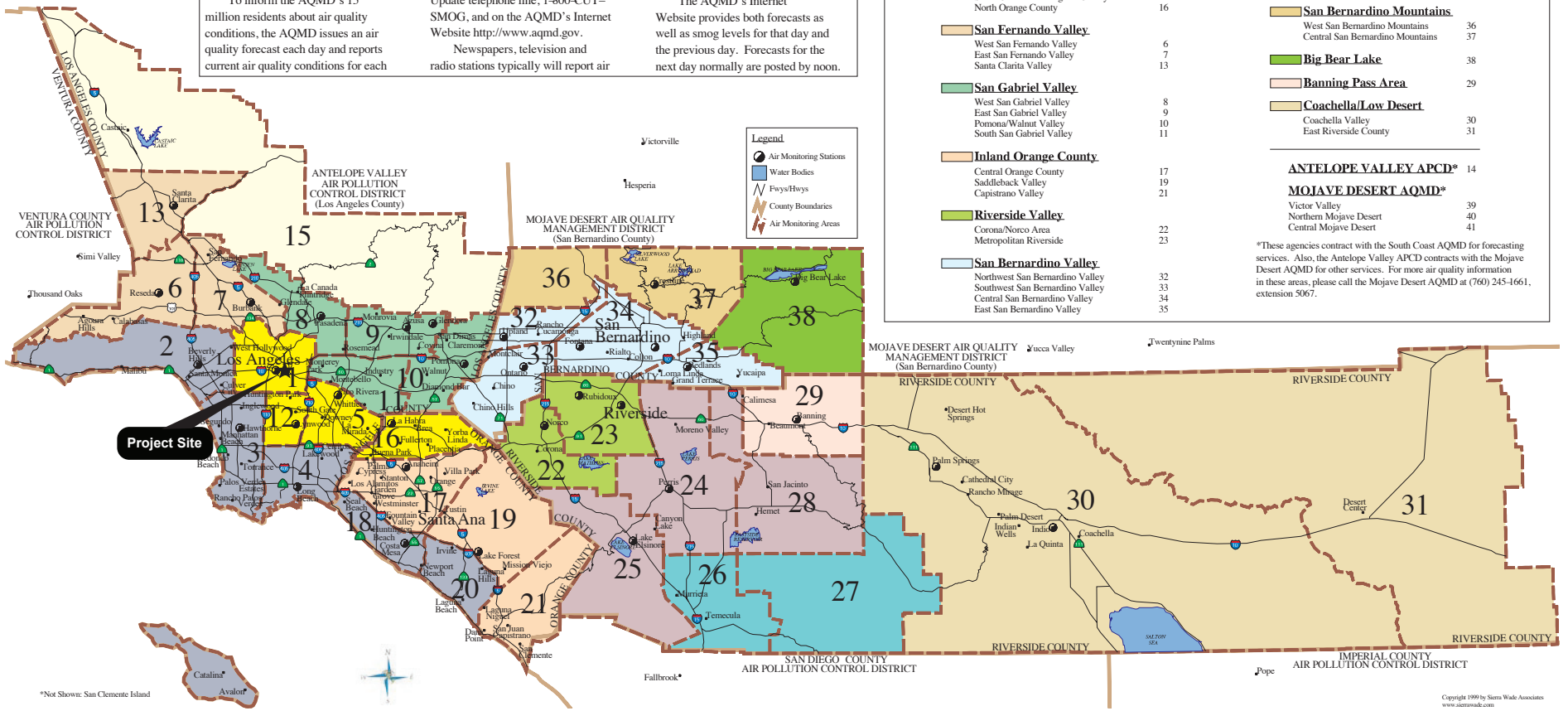

Figure IV.A-2
SCAQMD SRAs

Source: Sierra Wade Associates, 1999.

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

Pollutant	Year		
	2020	2021	2022
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.19	0.10	0.14
Days exceeding CAAQS (0.09 ppm)	14	1	1
Maximum 8-hour Concentration (ppm)	0.12	0.09	0.09
Days exceeding NAAQS (0.070 ppm)	22	2	6
Days exceeding CAAQS (0.07 ppm)	22	2	6
Respirable Particulate Matter (PM_{10})			
Maximum 24-hour Concentration (µg/m^3)	77	64	60
Days exceeding NAAQS (150 µg/m^3)	0	0	0
Days exceeding CAAQS (50 µg/m^3)	24	3	4
Annual Arithmetic Mean (µg/m3)	23	26	29
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)	47	61	34
Days exceeding NAAQS (35 µg/m^3)	2	12	0
Annual Arithmetic Mean (µg/m^3)	12	13	11
Does measured AAM exceed NAAQS (12 µg/m^3)?	**Yes**	**Yes**	**No**
Does measured AAM exceed CAAQS (12 µg/m^3)?	**Yes**	**Yes**	**No**
Carbon Monoxide (CO)			
Maximum 1-hour Concentration (ppm)	2	2	2
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	2
Days exceeding NAAQS and CAAQS (9 ppm)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.06	0.08	0.08
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)	0.004	0.002	0.007
Days exceeding CAAQS (0.25 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.A-2 (Continued)
Summary of Ambient Air Quality in the Project Vicinity

Pollutant	Year		
	2020	2021	2022
Lead (Pb)[a]			
Maximum 30-day Average Concentration (µg/m^3)	0.013	0.012	0.008
Does measured concentration exceed NAAQS (1.5 µg/m^3)	No	No	No
Maximum Calendar Quarter Concentration (µg/m^3)	0.011	0.012	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)	3.3	4.4	5.8
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] *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 (2020–2022).), www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed February 7, 2024.

of uses. To the east of the Project Site, across Mill Street, is additional property zoned as M3-1-RIO, including a 6-story building with mostly industrial use. To the west of the Project Site, across Almeda Street, is land zoned as PF (public facilities) and is comprised of an LA Metro bus storage facility. Additionally, there are various 7-story structures and a 10-story parking garage located across 7th Street from the LA Metro bus storage facility, which are part of the ROW DTLA development. To the south of the Project Site is land zoned as C2-2D-RIO and M3-1-RIO. To the immediate south of Industrial Street, a mixed-use project, comprised of live/work units and commercial, retail, restaurant and art production space, is currently under construction; however, the majority of the other southern parcels are either vacant or include one- and two-story buildings.

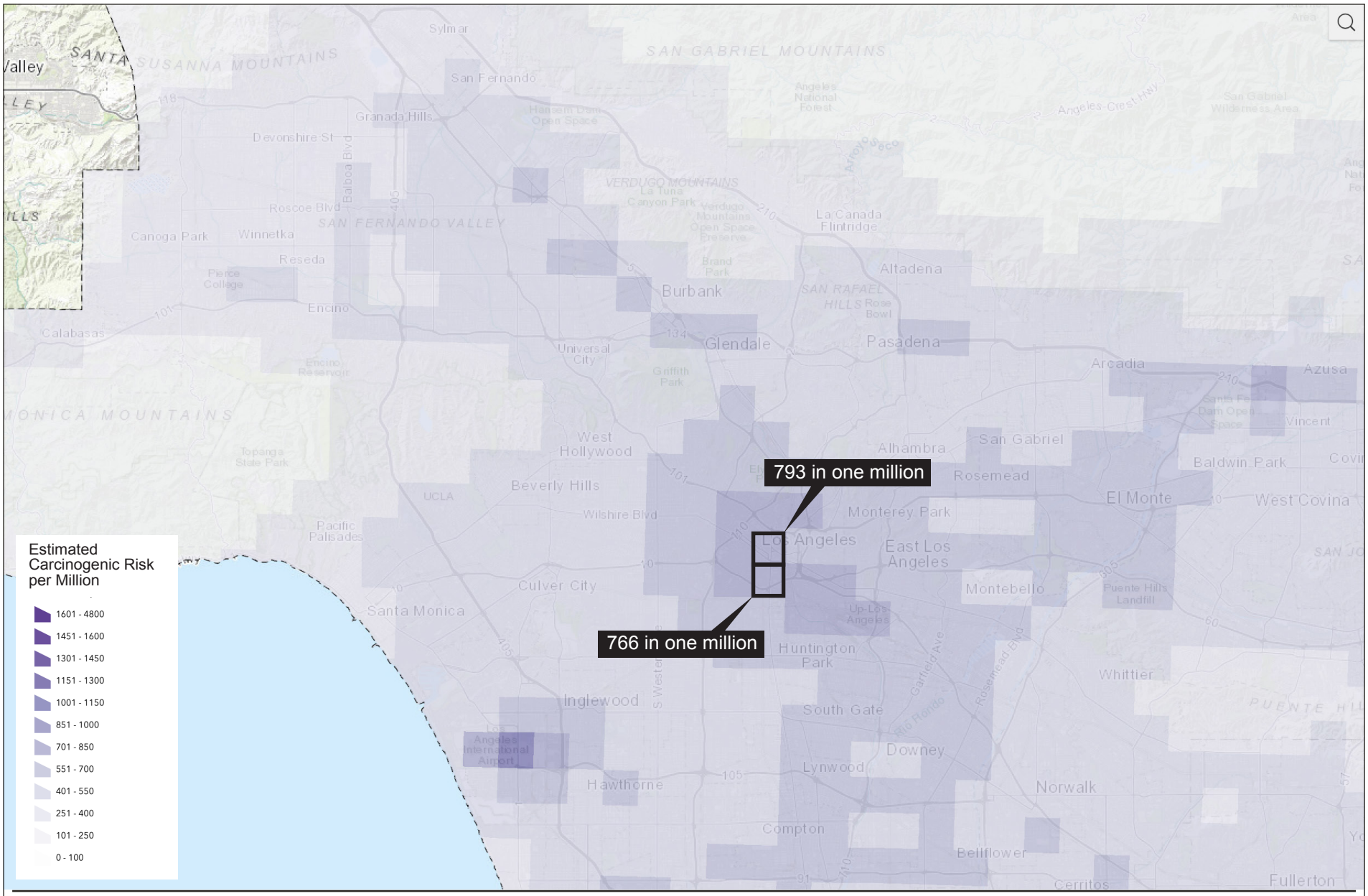

Figure IV.A-3
MATES V Total Cancer Risk for Project Area

Source: South Coast AQMD, 2021.

(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 vicinity of the Project Site include residential uses discussed above and shown in Figure IV.A-4 on page IV.A-31. The closest sensitive receptors are future residential uses in a mixed-use development located adjacent to the Project Site to the south, a future potential residential conversion located across Mill Street from the Project Site, residential units located across 6th Street from the Project Site, and Single Room Occupancy (SRO) Housing located at the northeast corner of Alameda Street and 6th Street, north of 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.A-4.

(e) Existing Project Site Emissions

The Project Site is currently developed with two single-story warehouse structures consisting of approximately 311,000 square feet of floor area. The existing buildings are currently used for storage and distribution purposes. The Project Site also includes surface parking areas for automobiles and tractor trailer trucks. Area source emissions are generated by maintenance equipment, landscape equipment, and use of products that contain solvents. Energy source emissions are typically associated with the buildings' natural gas usage. Mobile source emissions are generated by motor vehicle and truck trips to and from the Project Site. Table IV.A-3 on page IV.A-32 presents an estimate of the existing emissions currently generated by the uses on the Project Site.

Figure IV.A-4
Air Quality Sensitive Receptors Locations

Source: Google Earth Pro, 2023; Eyestone Environmental, 2023.

Table IV.A-3
Estimated Existing Daily Regional Operational Criteria Pollutant Emissions

Emission Source	Pollutant Emissions (pounds per day)[a]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Winter						
Area	7	<1	<1	<1	<1	<1
Energy	<1	<1	1	<1	<1	<1
Mobile	6	5	45	<1	8	2
Stationary	<1	<1	<1	<1	<1	<1
Total Existing Emissions	**14**	**6**	**46**	**<1**	**9**	**2**
Summer						
Area	10	<1	14	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	6	4	48	<1	8	2
Stationary	<1	<1	<1	<1	<1	<1
Total Existing Emissions	**16**	**6**	**63**	**<1**	**9**	**2**

Numbers may not add up exactly due to rounding.
[a] *Pollutant emissions are calculated using the CalEEMod emissions model.*
Source: Eyestone Environmental, 2024.

3. Project Impacts

a. Thresholds of Significance

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.

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 *L.A. CEQA*

Thresholds Guide, as appropriate and as presented below, to assist in answering the Appendix G Threshold questions.

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

(1) Construction

(a) Combustion Emissions from Construction Equipment

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

(b) 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.

(c) 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.

(d) Other Mobile Source Emissions

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

(2) 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 parts per million (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 determination of significance shall be made on a case-by-case basis, considering the following factors:

- 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 the 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.A-4 on page IV.A-36 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 the SCAQMD's *CEQA Air Quality Handbook and SCAQMD supplemental information*,[35] 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.A-4.
- 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-hr 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 the SCAQMD's *CEQA Air Quality Handbook*,[36] 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.A-4.

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

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

Table IV.A-4
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 (Pb)[d]	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor 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 μg/m3 (construction)[f] & 2.5 μg/m3 (operation) 1.0 μg/m3	
$PM_{2.5}$ 24-hour average	10.4 μg/m3 (construction) & 2.5 μg/m3 (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 μg/m3 (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 μg/m3 (state) 0.15 μg/m3 (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.A-4 (Continued)
SCAQMD Air Quality Significance Thresholds

emissions and would not exceed the significance thresholds for Pb. Unleaded fuel and unleaded paints have virtually eliminated Pb emissions from commercial 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 South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.*

[f] *Ambient air quality threshold based on South Coast AQMD Rule 403.*

Source: SCAQMD, 2019.

- 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 parts per million (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).[37]

- Maximum on-site localized operational PM_{10} and $PM_{2.5}$ emissions exceed the incremental 24-hr threshold of 2.5 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.[38]

- 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 the SCAQMD's *CEQA Air Quality Handbook*, the Project would have a significant toxic air contaminant impact, if:[39]

- The Project emits carcinogenic or toxic air contaminants that exceed the maximum incremental chronic and acute cancer risk as provided in Table IV.A-4 on page IV.A-36.

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

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

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

(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 the SCAQMD's *CEQA Air Quality Handbook*,[40] the following criteria are used to evaluate the Project's consistency with SCAQMD's 2022 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
  - 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 the 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.[41] As discussed in the 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*

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

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

> *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.*[42]

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.

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 the 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, the 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. The SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*.[43]

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) $PM_{2.5}$

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

[43] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed on September 14, 2023.*

significance thresholds and calculation methodology; and (8) updated SCAQMD Air Quality Significance Thresholds. The 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 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, could result from the use of construction equipment. Construction emissions can vary 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 the 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[44] (OFFROAD) and EMission FACtor model[45] (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"

[44] *CARB, 2021 Off-road Diesel Emission Factors, https://arb.ca.gov/emfac/offroad/, accessed March 5, 2024.*

[45] *CARB, EMFAC 2021, https://arb.ca.gov/emfac/, accessed March 5, 2024.*

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 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 the 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 the SCAQMD's significance thresholds, as described above.[46] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, and $PM_{2.5}$.[47] SCAQMD does not provide an LST for SO_2, Pb, and H_2S since land use development projects typically result in negligible construction and long-term operation emissions of these pollutants. 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. The 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. The shortest receptor distance provided in the SCAQMD look-up tables is 25 meters. The SCAQMD

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

[47] *SCAQMD, LST Methodology, p. 1-4.*

recommends that projects with boundaries closer than 25 meters to the nearest receptor use the LSTs for receptors located at 25 meters. As shown in Figure IV.A-4 on page IV.A-31, the closest sensitive receptors are future residential uses in a mixed-use development located adjacent to the Project Site to the south and there are three additional sensitive land uses within 25 meters. While there are other sensitive receptors in the Project vicinity, they are located farther from the Project Site. In accordance with SCAQMD recommendations, the LST receptor distance was assumed to be 25 meters. All other existing air quality-sensitive uses are located at greater distances from the Project Site and would experience lower air quality impacts from potential sources of emissions at the Project Site due to atmospheric dispersion effects.

SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. For projects that exceed 5 acres, such as the Project, the 5-acre LST look-up values can be used as a screening tool to determine which pollutants require detailed analysis.[48] This approach is conservative as it assumes that all on-site emissions would occur within a 5-acre area and would over-predict potential localized impacts (i.e., more pollutant emissions occurring within a smaller area, resulting in greater concentrations).

If the project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling must be performed to determine if the Project's local emissions exceed applicable significance thresholds.

(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, fireplaces, and the use of consumer products. Energy source emissions are generated as a result of activities in buildings for which natural gas is used (e.g., natural gas for cooking in commercial kitchens). 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 spray paint booths, charbroilers and proposed emergency generators during routine maintenance/ testing.

[48] *Telephone Conversation, Ian MacMillan, SCAQMD CEQA Program Supervisor, November 10, 2011.*

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 offsite 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 for the Project, which was conducted consistent with Los Angeles Department of Transportation's (LADOT) *Transportation Impact Study Guidelines*.[49] 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.[50] Area source emissions are based on natural gas (e.g., building heating and water heaters), landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Natural gas usage factors in CalEEMod, to the extent considered, are based on the California Energy Commission California Commercial End Use Survey data set, which provides energy demand by building type and climate zone. 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. The emissions are based on the horsepower rating of the diesel generator and the number of hours operated per year for testing purposes.

Pollutant emissions are associated with delivery trucks, catering trucks, service trucks, and other trucks used to deliver materials or provide services to television production operations. Existing operational truck trips and distribution were based on manual trip counts conducted for the Project Site.[51] Project operational truck trips were estimated by Gibson

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[49] *Gibson Transportation Consulting, Inc., Transportation Assessment for the East End Studios ADLA Project, City of Los Angeles, September 2023.*

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

[51] *City Count, LLC., Wholesale Street and S. Alameda St Driveway Counts for October 26–November 1, 2023, Los Angeles, California, December 7, 2023.*

Transportation.[52] Based on existing trip counts and future projections, the Project would result in a net decrease in heavy duty and medium duty trucks with removal of the existing warehousing uses. However, as a conservative assumption, no reduction in regional or localized truck emissions were assumed from the removal of existing uses. Existing truck counts and operational truck trip estimates are provided in Appendix B of this Draft EIR.

Modern studios, such as the Project, function in a manner that provides each individual production with the flexibility to choose how to use their space to meet their specific needs. Traditional set making and processes, such as fabrication and painting, have shifted to digital production and virtual environments, reducing the need for physical construction techniques. Thus, paint usage related to production support would be limited. For purposes of this analysis, it was conservatively assumed that the Project would include a spray paint booth with use of up to three gallons per day of spray paint during operations. Emissions from spray paint usage were calculated using the SCAQMD Annual Emissions Reporting (AER) methodology. Spray paint booths would be required to obtain necessary SCAQMD permits and comply with applicable rules (e.g., efficient paint sprayers and High Efficiency Particulate Air (HEPA) filtration with 99.97 percent PM_{10} filtration).

The Project may allow catering trucks to access the Project Site and provide meals for studio operations. Pollutant emissions from catering trucks were calculated based on emission factors provided in SCAQMD Rule 1138 for commercial cooking operations related to charbroilers or griddles. It is anticipated that the Project could have up to three catering trucks equipped with a charbroiler or griddle per day on average to support studio operations. The Project could also potentially have a restaurant use that could include a charbroiler or griddle.

To determine if a significant air quality impact would occur, the net increase in regional operational emissions generated by the Project was compared against the SCAQMD's significance thresholds.[53] 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. The net increase in operational emissions is calculated based on Project operational emissions minus Existing operational emissions. Operational emissions for both the Project and Existing conditions are calculated based on future buildout year. This is a conservative assumption as the CalEEMod and EMFAC models take into account more stringent vehicle

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52 *Gibson Transportation Consulting, Inc., Truck Trip Forecasts for the East End Studios Projects, Los Angeles, California.*

53 *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).*

emissions standards for future years and, thus, results in lower emissions to offset emissions from proposed land uses. 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 the 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.[54]

It has been recognized that CO exceedances are caused by vehicular emissions,[55] primarily when idling at intersections.[56,57] 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.[58] Since the first regulation 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,[59,60] and new cold weather CO standards have been implemented, effective for the 1996 model year.[61] Currently, the CO standard in California is a maximum of 3.4 grams per mile for

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

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

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

[57] *SCAQMD. 2003. Air Quality Management Plan.*

[58] *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 on September 14, 2023.*

[59] *National Academy Board on Energy and Environmental Systems, Review of the 21st Century Truck Partnership, 2008, Appendix D: Vehicle Emission Regulations [excerpt from http://books.nap.edu/openbook.php?record_id=12258&page=107].*

[60] *Kavanagh, Jason, Untangling U.S. Vehicle Emissions Regulations, 2008.*

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

passenger cars (with provisions for certain cars to emit even less).[62] 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 the 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 the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[63] 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 intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at 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.[64] The AQMP CO hotspots modeling also accounted for worst-case meteorological conditions and background CO concentrations. The Los Angeles County Metropolitan Transportation Authority (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.[65,66] 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 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

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62 *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.*

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

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

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

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

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).[67] SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.[68] 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," 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. 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

The Project would include the following project design feature with regard to air emissions:

Project Design Feature AQ-PDF-1: Prior to demolition, a Project representative shall make available to the City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 25 horsepower. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board (CARB) or

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

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

SCAQMD operating permit shall be available on-site at the time of mobilization of each applicable unit of equipment to allow a Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit.

Off-road diesel-powered equipment within the construction inventory list described above shall meet the United States Environmental Protection Agency (USEPA) Tier 4 Final standards.

While not specific to air quality, Project Design Feature GHG-PDF-1 included in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, would also serve to reduce air pollutant emissions and reduce the use of natural gas on the Project Site by prohibiting the use of natural gas during Project operations, with exceptions provided for: (1) water heaters; (2) food operations (e.g., restaurant/commissary uses); and (3) building heating for studio uses. The proposed office buildings would use electricity for building heating. Further, it is noted that subsequent to the design of the Project, Ordinance No. 187,714 was passed by the City requiring new buildings to be all electric buildings with exceptions provided for food preparation uses. The Project would comply with this City requirement.

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. 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?

(i) Criterion 1

With respect to the first criterion, as discussed below under the analysis for Threshold (c), localized concentrations of NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ were 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. Additionally, 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.A-9 on page IV.A-69 respectively, in the analysis below, the increases in localized NO_2 as NO_X, CO, PM_{10} and $PM_{2.5}$ emissions during construction and operations would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site.

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.[69] As indicated under the analysis for Threshold (c), no intersections would require a CO hotspot analysis, and impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations. Thus, 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

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

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 control measures. 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 2022 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 form 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.F, Land Use and Planning, of this Draft EIR, the City's General Plan 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 Project Site is located within the Central City North Community Plan area, which encourages mixed-use developments along commercial corridors in the area.[70] The 2020–2045 RTP/SCS provides socioeconomic 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.

While the Project would generate short-term construction jobs, these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of 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, representing hundreds of employees for the Project directly in relation to hundreds of thousands of jobs accounted for in the RTP/SCS forecast, and would be temporary in nature. Therefore, the Project's construction jobs would

[70] *City of Los Angeles, Central City North Community Plan, Goal 1, Objective 1-2.1, p. III-3.*

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 employment forecast for the City of Los Angeles Subregion in 2023 was approximately 1,917,721 employees.[71] In 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,473 employees.[72]

As discussed in Section II, Project Description, of this Draft EIR, the Project would comprise a total floor area of 675,611 square feet of studio and support uses. Based on employee generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 2,245 net new employees, which would constitute approximately 7.55 percent of the employment growth forecasted between 2023 and 2026 (approximately 29,752 employees) based on the 2020–2045 RTP/SCS.[73,74]

As discussed previously, the 2022 AQMP is based on SCAG's RTP/SCS, which incorporates data from General Plans, as well as local land use data, such as the Community Plan. The Project-related 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 employment projections form the basis of the 2022 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 the SCAQMD, as summarized above. In addition, the Project

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[71] *Based on a linear interpolation of 2016–2045 data.*

[72] *Based on a linear interpolation of 2016–2045 data.*

[73] *Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions. The employee generation rate of 0.001 employee per square foot for "Light Industry" land use is applied to the 311,000 square feet of existing offices. As such, the existing uses generate approximately 311 employees. With regard to proposed uses, the employee generation rate of 0.004 employee per square foot for "General Office" land use is applied to the 299,407 square feet of proposed offices, the employee generation rate of 0.002 employee per square foot for "General Retail" land use is applied to the 4,000 square feet of proposed retail use, the employee generation rate of 0.004 employee per square foot for "High Turnover (Sit Down Restaurant)" land use is applied to the 4,000 square feet of proposed restaurant, and custom employee number for the studio uses. As documented in Appendix A, VMT Analysis LADOT Calculator Worksheets, of the Project's Transportation Assessment (Appendix I of this Draft EIR), the Project would generate approximately 2,556 new employees. Therefore, the Project would result in a net generation of 2,556–311 = 2,245 employees.*

[74] *Project's net increase in employees (2,245) ÷ Increase in employment in City of LA subregion from 2023 to 2026 (29,752) = 5.15 percent*

would also comply with CARB regulations regarding limiting truck idling and fleet rules, which require specific emissions standards according to fleet size. As discussed above, the Project would implement Project Design Feature AQ-PDF-1, which would require diesel-powered equipment to meet the USEPA Tier 4 Final standards. Overall, as demonstrated in this section, air quality impacts would be less than significant and no mitigation is necessary. 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 AQMP with those prepared by SCAG. The transportation control measures, 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, SCAG's 2020-2045 RTP/SCS land use control measures (i.e., goals and policies) focus on the reduction of vehicle trips and VMT. As discussed in Section IV.F, Land Use and Planning, of this Draft EIR, the Project would support a number of land use policies of the City and SCAG that would reduce vehicle trips and VMT.

The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. The Project is an infill development within an existing urbanized area that would concentrate office and studio uses within a High Quality Transit Area (HQTA).[75] There are various local, limited stop and rapid bus routes in the immediate vicinity of the Project Site. There are nine local bus routes, including seven Metro bus lines and two bus routes from LADOT Commuter Express and Montebello Bus Lines, which run within 0.25 mile of the Project Site. The Project would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the Los Angeles Municipal Code.

As further discussed in Section IV.E, 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). 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

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

from a standard project within the Air Basin help quantify the criteria air pollutant emissions reductions achieved by locating the Project in an infill site within an HQTA that promotes alternative modes of transportation.

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 EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.[76] 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 shown in Appendix B, incorporation of USEPA MXD VMT reduction features and City requirements applicable to the Project results in a 33-percent reduction in overall VMT and resultant pollutant emissions compared to the baseline ITE trip generation rates.[77]

As an infill development located near existing transit, the Project would contribute to a reduction in air quality emissions via a reduction in vehicle trips and VMT, consistent with the SCAG's RTP/SCS and SCAQMD's AQMP land use policies. Based on the Project's consistency with the AQMP's population growth and the Project's less-than-significant localized air quality impacts, as well as the Project attributes as an infill development that results in reduced vehicle trips, VMT, and emissions, the Project is consistent with applicable SCAQMD and SCAG air quality policies.

(b) City of Los Angeles Policies

To achieve the goals of the Air Quality Element, performance-based standards have been adopted to provide flexibility in implementation of its policies and objectives. The Air Quality Element goals, objectives, and policies that are relevant to the Project are presented in Table IV.A-5 on page IV.A-55. The Project would promote these Air Quality Element goals, objectives, and policies. Specifically, the Project would provide 173 bicycle parking spaces, consisting of 68 short-term spaces and 105 long-term spaces. The Project would provide

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[76] *Environmental Protection Agency, Mixed-Use Trip Generation Model. www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed on September 14, 2023.*

[77] *Refer to Appendix B-3.1, Greenhouse Gas Worksheets, GHG Parameters, VMT, included in Appendix B (Air Quality and Greenhouse Gas Worksheets) of this Draft EIR.*

opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. In addition, the Project would be consistent with the existing land use patterns in the vicinity of the Project Site that concentrates urban density along major arterials and near transit options. As shown in Appendix B, incorporation of these VMT reduction features and City requirements applicable to the Project would result in a 33-percent reduction in overall VMT compared to the baseline ITE trip generation rates. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. A more detailed analysis of the Project's consistency with the City's General Plan is presented in Table IV.A-5, which identifies specific goals and policies of the City's General Plan Air Quality Element and demonstrates the Project's consistency with these goals.

Based on the above, the Project would not conflict with applicable policies of the Air Quality Element. Refer to Section IV.F, 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, as discussed above, the Project would not conflict with or obstruct implementation of the 2022 AQMP, as well as applicable policies of the City of Los Angeles pertaining to air quality. As such, impacts to Threshold (a) would be less than significant.

(2) Mitigation Measures

Project-level impacts with regard to 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 with regard to implementation of the applicable air quality plan 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.

Table IV.A-5
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goals, Objectives, and Policies	Would the Project Conflict?
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	**No Conflict.** The Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by developing a new production studio campus that would meet the needs of local residents and sustain economic growth. The Project would introduce new employment opportunities in an area with existing residential uses and skilled residents who may fulfill some of the new employment opportunities created by the Project, resulting in a reduction in VMT. The Project would also provide required 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. As such, the Project would not conflict with this goal.
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 are 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, including local and regional bus and rail lines. The Project would thus encourage alternative means of transportation, and focuses growth in a high-density, jobs-rich area in close proximity to transit, thereby increasing traffic mobility while also sustaining economic growth. As such, 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 be maintained in a clean and well-kept manner. The Project would, thus, reduce air emissions emanating from unpaved areas, parking lots, and construction sites. As such, the Project would not conflict with this objective.
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 a regional job center (i.e., Downtown Los Angeles), as well as residential, restaurants, retail, and commercial uses, thereby reducing the VMT of future employees. Future

Table IV.A-5 (Continued)
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goals, Objectives, and Policies	Would the Project Conflict?
	employees on the Project Site would also have access to local bus lines, as well as the use of bicycle parking spaces provided on the Project Site. The Project's proximity to both a job center and housing, as well as options for the use of alternative modes of transportation would reduce reliance on single-occupant vehicles. As such, 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 would be located approximately 1.1 mile from Union Station and within 0.75 mile of the Metro A and E Lines Little Tokyo/Arts District Station and would be served by multiple local bus lines within 0.25 mile. 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. The Project would also locate office and studio uses near residential, restaurant, retail, and commercial uses, which are easily accessible from the Project Site through walking or biking and contribute to trip reduction to achieve regional air quality goals. As such, 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 would be located approximately 1.1 mile from Union Station and would be served by multiple local bus lines. The Project would incorporate pedestrian pathways that would connect to the existing sidewalk network. In addition, the Project would provide 173 bicycle parking spaces, including 68 short-term spaces and 105 long-term spaces. Thereby, the Project would reduce VMT and vehicle trips. As such, the Project would not conflict with this policy.
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, development of commercial uses near major employment areas, and access to public transportation within 0.25 mile of the Project Site, resulting in minimal impact of existing land use patterns and future development. As such, 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 indicators established by the SCAQMD, which considers attainment of the ambient air quality standards. The Project also incorporates land use characteristics that would reduce land use planning-related air pollutant emissions, as previously described above. 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.

Table IV.A-5 (Continued)
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goals, Objectives, and Policies	Would the Project Conflict?
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 be located approximately 1.1 mile from Union Station and within 0.75 mile of the Metro A and E Lines Little Tokyo/Arts District Station and would be served by multiple local bus lines. The Project would incorporate pedestrian pathways that would connect to the existing sidewalk network. In addition, the Project would provide 173 bicycle parking spaces, including 68 short-term spaces and 105 long-term spaces. As such, the Project would reduce VMT and vehicle trips, and the Project would not conflict with this policy.
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 improve accessibility for the City's residents to a place of employment due to its infill location and development of commercial office and studio uses near major residential and employment areas, with access to public transportation within 0.25 mile of the Project Site. The Project would also be located within 0.5 mile of off-site commercial, retail, restaurant, and entertainment uses, improving accessibility for employees and visitors to these other uses. As such, 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 would incorporate pedestrian pathways that would connect to the existing sidewalk network and access to public transportation within 0.25 mile of the Project Site. In addition, the Project would provide 173 bicycle parking spaces, including 68 short-term spaces and 105 long-term spaces. The Project would also comply with City requirements for providing electric vehicle charging infrastructure and electric vehicle charging stations within the proposed parking areas. As such, 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. As such, 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 0.25 mile 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 173 bicycle parking spaces, including 68 short-term spaces and 105 long-term spaces. Furthermore, the Project would develop and implement a Transportation Demand Management (TDM) program to promote non-auto travel and reduce the use of single-occupant vehicle trips for employees. As such, the Project would not conflict with this policy.
Goal 5: Energy efficiency through land use and transportation planning, the use of	**No Conflict.** The Project's location, land use characteristics, and Project design features would reduce

Table IV.A-5 (Continued)
Project Consistency with City of Los Angeles General Plan Air Quality Element

Goals, Objectives, and Policies	Would the Project Conflict?
renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.	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 are 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, including local and regional bus and rail lines. Moreover, the Project would include the installation of EV charging stations at 10 percent of provided total new parking spaces on the new parking levels. In addition, the Project would comply with City Ordinance No. 187,714, which requires that all new buildings be all-electric buildings with exceptions provided for restaurant uses. As such, the Project would not conflict with this goal.
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 are 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 public transit, including local and regional bus and rail lines. Moreover, the Project would provide for the installation of EV charging stations at 10 percent of provided total new parking spaces on the new parking levels. In addition, the Project would comply with City Ordinance No. 187,714, which requires that all new buildings be all-electric buildings with exceptions provided for restaurant uses. As such, the Project would not conflict with this objective.
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. As such, the Project would not conflict with this objective.
Source: Eyestone Environmental, 2024.	

Threshold (b): Would the Project 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

Project construction would occur in sequential phases (e.g., demolition, then grading and foundation, then building construction) with buildout expected to be completed in 2026. For purposes of conservatively analyzing construction impacts and to ensure that potential overlap of construction phases is accounted for, it was assumed that the Project's construction schedule could be compressed and be completed in 25 months with overlapping construction phases. Based on SCAQMD factors, the construction equipment and truck fleet mix will emit less pollution in future years due to more stringent emissions control regulations. As construction activities for the Project are evaluated based on an earlier start date, the emissions presented are more conservative. Under this conservative construction schedule that is intended to address potential overlapping construction activities, Project construction would begin with demolition followed by grading and excavation activities up to 11 feet. The conservative construction schedule assumes that while excavation is occurring on one portion of the Project Site, concrete pour activities may be occurring on other portions of the site resulting in overlapping activities (excavation and concrete pour activities). Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Approximately 40,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during excavation.

As construction air quality impacts are evaluated on a worst-case day, the shorter construction duration would assume more intensive activities on a daily basis, as well as overlapping activities. 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 equipment mix, and the number of workers and delivery and haul truck trips, are included in Appendix B (CalEEMod Construction Output file).

As presented in Table IV.A-6 on page IV.A-60, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not

Table IV.A-6
Estimate of Maximum Regional Project Daily Construction Emissions (pounds per day)[a]

Construction Year	VOC[b]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Construction Emissions Winter						
Year 2024	3	39	108	<1	11	3
Year 2025	3	39	106	<1	10	2
Year 2026	64	38	105	<1	10	2
Maximum Unmitigated Construction	64	39	108	<1	11	3
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(11)**	**(61)**	**(442)**	**(150)**	**(139)**	**(52)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Regional Construction Emissions Summer						
Year 2024	3	39	110	<1	16	3
Year 2025	3	38	109	<1	10	2
Year 2026	62	22	56	<1	4	<1
Maximum Unmitigated Construction	62	39	110	<1	16	3
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(13)**	**(61)**	**(440)**	**(150)**	**(134)**	**(52)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *Construction emissions presented take into account implementation of Project Design Feature AQ-PDF-1 which requires use of EPA Tier 4 compliant equipment. The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR. Refer to the Air Quality summary sheets included therein for maximum emissions without Project Design Feature AQ-PDF-1, which remain below SCAQMD significance thresholds.*

[b] *It is noted 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.*

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

Source: Eyestone Environmental, 2024.

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 regional area, energy, mobile source, and stationary 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.E, Greenhouse Gas Emissions, of this Draft EIR.

As shown in Table IV.A-7 on page IV.A-63, regional operational emissions for the Project with implementation of Project Design Feature GHG-PDF-1, which would limit the use of natural gas on the Project Site, would not exceed any of the SCAQMD's daily regional operational thresholds. As discussed above, subsequent to the design of the Project, Ordinance No. 187,714 was passed by the City, which requires all-electric buildings with some exceptions, including an exception for food preparation uses. As noted in Table IV.A-7, compliance with City Ordinance No. 187,714 in comparison to implementation of Project Design Feature GHG-PDF-1 would further decrease emissions by approximately 1.4 pounds per day of NO_X, 1.2 pounds per day of CO, 0.1 pounds per day of VOC, PM_{10} and $PM_{2.5}$, and a negligible reduction in SO_X. Therefore, regional operational emissions generated by the Project would result in a less-than-significant air quality impact.

(b) Localized Emissions

As previously discussed, the 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) and shown in Table IV.A-9 on page IV.A-69 in the analysis below, Project-related construction emissions would not exceed any of the localized thresholds. Therefore, localized construction emissions associated with the Project would result in a less-than-significant air quality impact.

(ii) Operation

Project-related operational emissions were also evaluated based on SCAQMD LST methodology from on-site sources (e.g., cooking appliances, spray paint booths, charbroilers). As shown in Table IV.A-9 in the analysis below, localized operational emissions for the Project with implementation of Project Design Feature GHG-PDF-1, which would limit the use of natural gas on the Project Site, would not exceed any of the SCAQMD's daily localized operational thresholds. As discussed above, subsequent to the design of the Project, Ordinance No. 187,714 was passed by the City requiring new buildings to be all

electric with some exceptions. As noted in Table IV.A-9 on page IV.A-69 in the analysis below, in compliance with City Ordinance No. 187,714 in comparison to implementation of Project Design Feature GHG-PDF-1 would further decrease emissions by approximately 1.4 pounds per day of NO_X, 1.2 pounds per day of CO, and 0.1 pounds per day of PM_{10} and $PM_{2.5}$. 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- and off-site sources would not exceed any of the localized thresholds. Therefore, localized operational emissions generated by the Project would result in a less-than-significant air quality impact.

(c) Conclusion

According to SCAQMD guidance, individual projects that exceed the 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.[78]

As shown in Table IV.A-6 and Table IV.A-7 on pages IV.A-60 and IV.A-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.A-8 and Table IV.A-9 on pages IV.A-65 and IV.A-69, respectively, in the analysis below. Thus, 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.**

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

Table IV.A-7
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout (2026)[a]

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Winter[b]						
Area	7	<1	<1	<1	<1	<1
Energy (Natural Gas)[c]	<1	1	1	<1	<1	<1
Mobile	5	4	37	<1	8	2
Stationary	<1	<1	<1	<1	<1	<1
Total	13	5	38	<1	9	2
Project Winter						
Area	16	<1	<1	<1	<1	<1
Energy (Natural Gas)[c]	<1	1	1	<1	<1	<1
Mobile	12	9	88	<1	20	5
Stationary	5	22	13	<1	<1	<1
Charbroiler	<1	<1	<1	<1	1	<1
Spray Booth	7	<1	<1	<1	<1	<1
Total	41	32	101	<1	21	6
Project less Existing Winter						
Area	9	<1	<1	<1	<1	<1
Energy (Natural Gas)[c]	(<1)	(<1)	(<1)	(<1)	(<1)	(<1)
Mobile	7	5	50	<1	12	3
Stationary	5	22	13	<1	<1	<1
Charbroiler	<1	<1	<1	<1	1	<1
Spray Booth	7	<1	<1	<1	<1	<1
Total Proposed Uses Emissions	**28**	**27**	**63**	**<1**	**13**	**4**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(27)**	**(28)**	**(487)**	**(150)**	**(137)**	**(51)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Existing Summer[b]						
Area	10	<1	14	<1	<1	<1
Energy (Natural Gas)[c]	<1	1	1	<1	<1	<1
Mobile	5	3	40	<1	8	2
Stationary	<1	<1	<1	<1	<1	<1
Total	15	5	55	<1	9	2
Project Summer						
Area	23	<1	43	<1	<1	<1
Energy (Natural Gas)[c]	<1	1	1	<1	<1	<1
Mobile	12	8	94	<1	20	5
Stationary	5	22	13	<1	<1	<1
Charbroiler	<1	<1	<1	<1	2	<1
Spray Booth	7	<1	<1	<1	<1	<1
Total	48	32	151	<1	22	6

Table IV.A-7 (Continued)
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout (2026)

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project less Existing Summer						
Area	14	<1	29	<1	<1	<1
Energy (Natural Gas)[c]	(<1)	(<1)	(<1)	(<1)	(<1)	(<1)
Mobile	7	5	54	<1	12	3
Stationary	5	22	13	<1	<1	<1
Charbroiler	<1	<1	<1	<1	1	<1
Spray Booth	7	<1	<1	<1	<1	<1
Total Proposed Uses Emissions	**33**	**27**	**96**	**<1**	**13**	**4**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(22)**	**(28)**	**(454)**	**(150)**	**(137)**	**(51)**
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] *Existing emissions estimated for the year of Project buildout (2026).*

[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates and account for implementation of Project Design Feature GHG-PDF-1. Subsequent to design of the Project, Ordinance No. 187,714 was passed by the City and the Project would be required to comply with the ordinance. In compliance with City Ordinance No. 187,714 in comparison to implementation of Project Design Feature GHG-PDF-1, would further decrease emissions by approximately 1.4 pounds per day of NO_X, 1.2 pounds per day of CO, 0.1 pounds per day of VOC, PM_{10} and $PM_{2.5}$, and a negligible reduction in SO_X. Regional operational impacts would remain less than significant.*

Source: Eyestone Environmental, 2024.

(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 construction and operation of the Project were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Table IV.A-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 2024	31	90	6	<1
Year 2025	31	90	5	<1
Year 2026	31	90	6	<1
Maximum Unmitigated Daily Localized Emissions	**31**	**90**	**6**	**<1**
SCAQMD Localized Significance Thresholds[c]	**119**	**1,861**	**16**	**8**
Over/(Under)	**(87)**	**(1,771)**	**(10)**	**(7)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Summer				
Year 2024	31	90	10	**1**
Year 2025	31	90	5	**<1**
Year 2026	19	51	2	**<1**
Maximum Unmitigated Daily Localized Emissions	**31**	**90**	**10**	**1**
SCAQMD Localized Significance Thresholds[c]	**119**	**1,861**	**16**	**8**
Over/(Under)	**(87)**	**(1,771)**	**(6)**	**(7)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *Construction emissions presented take into account implementation of Project Design Feature AQ-PDF-1 which requires use of EPA Tier 4 compliant equipment. The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR. Refer to the Air Quality summary sheets included therein for maximum emissions without Project Design Feature AQ-PDF-1, which remain below SCAQMD significance thresholds.*

[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 3.73 acre site 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, 2024.

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 the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[79] 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 (2020–2022) for the Project area presented in Table IV.A-2 on page IV.A-27. Although the trend shown in Table IV.A-2 demonstrates that ambient air quality is improving in the area, the localized construction emissions analysis conservatively did not apply any expected reduction in background pollutant concentrations for subsequent years of construction (i.e., 2024–2026). By doing so, the allowable pollutant increment to not exceed an ambient air quality standard is more stringent, thus making this analysis more conservative. The analysis and LSTs take into account the existing background ambient air quality monitoring data (2020–2022).

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 5-acre site. Although the Project Site is larger than five acres, it was conservatively assumed that all on-site emissions would occur within a 5-acre area. As discussed above, this approach is recommended by SCAQMD for a screening-level analysis and would also over-predict potential localized impacts as more pollutant emissions would occur within a smaller area and within closer proximity to potential sensitive receptors. Potential impacts were evaluated at the closest off-site sensitive receptor, which are future residential uses in a mixed-use development located adjacent to the Project Site to the south. In accordance with SCAQMD recommendations, the LST receptor distance was assumed to be 25 meters. Ambient air quality standards for NOx and CO have averaging times of 1-hour and 8-hour, respectively.

The maximum daily localized emissions from Project construction and LSTs are presented in Table IV.A-9 on page IV.A-69. As presented in Table IV.A-9, maximum localized 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 impact.

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

(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.

Project construction would result in a peak of 630 passenger car equivalent (PCE) trips, which includes employee, delivery, and haul truck trips during building construction.[80] The highest average daily trips at an intersection under the Existing Condition would be approximately 56,000 trips at the Alameda Street and 7th Street intersection.[81] Conservatively assuming that all of the Project construction vehicles would drive through this intersection would result in approximately 56,630 trips (ambient and project construction trips), which is significantly lower than the daily traffic volume of 400,000 vehicles per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[82] This daily trip estimate is based on the peak hour conditions of the intersection. The Project's off-site construction activities, including the highest average daily trips, would not expose sensitive receptors to substantial CO concentrations. As a result, impacts related to localized construction mobile-source CO emissions would be less than significant.

(iii) Toxic Air Contaminants

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 short-term construction schedule of approximately four years, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment (HRA) for short-term construction emissions. It is, therefore, not necessary to evaluate long-term cancer impacts from construction activities which occur over a relatively short duration. Project construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, Project-related TAC impacts during construction would be less than significant.

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[80] *Gibson Transportation Consulting Inc., Transportation Assessment for the East End Studios ADLA Project, City of Los Angeles, August 2023.*

[81] *Appendix B-2.8: Existing Truck Counts. Assumes that peak hour intersection volumes represent 10 percent of the daily volumes.*

[82] *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.*

(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.A-9 on page IV.A-69 for the Project. The SCAQMD LST mass rate look-up tables were used to evaluate potential localized impacts. As shown in Table IV.A-9, localized operational emissions for the Project with implementation of Project Design Feature GHG-PDF-1, which would limit the use of natural gas on the Project Site, would not exceed any of the SCAQMD's daily localized operational thresholds. As discussed above, subsequent to the design of the Project, Ordinance No. 187,714 requiring all-electric buildings (except for food preparation uses) was passed by the City. As noted in Table IV.A-9, compliance with City Ordinance No. 187,714 in comparison to implementation of Project Design Feature GHG-PDF-1 would further decrease emissions by approximately 1.4 pounds per day of NO_X, 1.2 pounds per day of CO, and 0.1 pounds per day of PM_{10} and $PM_{2.5}$. The Project's on-site operational activities, including generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, 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 need to prepare a detailed CO hot spot analysis.

At buildout of the Project, the highest average daily trips at an intersection would be approximately 60,000 trips (ambient and project) at the Alameda Street and 7th Street intersection, which is significantly lower than the daily traffic volume of 400,000 vehicles per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[83] There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Alameda Street and 7th Street 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.[84] In 2003, the maximum

[83] *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.*

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

Table IV.A-9
Estimate of Maximum Localized Project Daily Operational Emissions—At Project Buildout (2028) (pounds per day)[a]

Emission Source	Pollutant Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Existing Winter				
Area	<1	<1	<1	<1
Energy (Natural Gas)	1	1	<1	<1
Stationary	0	0	0	0
Total	1	1	<1	<1
Project Winter				
Area	<1	<1	<1	<1
Energy (Natural Gas) [b]	1	1	<1	<1
Stationary	22	13	<1	<1
Charbroiler	<1	<1	1	<1
Spray Booth	<1	<1	<1	<1
Total	23	14	1	<1
Project less Existing Winter				
Area	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Stationary	22	13	<1	<1
Charbroiler	<1	<1	1	<1
Spray Booth	<1	<1	<1	<1
On-Site Total	**22**	**13**	**1**	**1**
SCAQMD Significance Threshold[c,d]	**119**	**1,861**	**4**	**2**
Over/(Under)	**(97)**	**(1,848)**	**(3)**	**(1)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Existing Summer				
Area	<1	14	<1	<1
Energy (Natural Gas)	1	1	<1	<1
Stationary	0	0	0	0
Total	1	15	<1	<1
Project Summer				
Area	<1	43	<1	<1
Energy (Natural Gas) [b]	1	1	<1	<1
Stationary	22	13	<1	<1
Charbroiler	<1	<1	1	<1
Spray Booth	<1	<1	<1	<1
Total	24	56	1	<1
Project less Existing Summer				
Area	<1	29	<1	<1
Energy (Natural Gas)	(<1)	(<1)	(<1)	(<1)
Stationary	22	13	<1	<1

Table IV.A-9 (Continued)
Estimate of Maximum Localized Project Daily Operational Emissions—At Project Buildout (2028)
(pounds per day)

Emission Source	Pollutant Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Charbroiler	<1	<1	1	<1
Spray Booth	<1	<1	<1	<1
On-Site Total	**22**	**42**	**1**	**1**
SCAQMD Significance Threshold[c,d]	**119**	**1,861**	**4**	**2**
Over/(Under)	**(96)**	**(1,819)**	**(3)**	**(1)**
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] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates and account for implementation of Project Design Feature GHG-PDF-1. Subsequent to the design of the Project, Ordinance No. 187,714 was passed by the City requiring all-electric buildings. Compliance with City Ordinance No. 187,714 in comparison to implementation of Project Design Feature GHG-PDF-1, would further decrease emissions by approximately 1.4 pounds per day of NO_X, 1.2 pounds per day of CO and 0.1 pounds per day of PM_{10} and $PM_{2.5}$. Localized operational impacts would remain less than significant.*

[c] *Potential localized construction impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 1 for a 5 acre 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, 2024.

1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2022.[85] 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 a result, impacts related to localized mobile-source CO emissions are considered less than significant.

[85] *SCAQMD, 2022 Air Quality Data Table.*

(iii) Toxic Air Contaminants

The primary sources of potential air toxics associated with Project operations include 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., natural gas fired boilers). However, these activities and the land uses associated with the Project are not considered land uses that generate substantial TAC emissions. It should be noted that SCAQMD recommends that HRAs be conducted for substantial individual sources of DPM (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.[86] However, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions. Also, as discussed above, the Project would result in a net decrease in heavy duty diesel truck trips resulting from removal of the existing warehousing uses. Traffic counts were performed for the existing warehouse, which estimated an average of 116 truck trips per day, while the Project would be expected to generate 13 truck trips per day (see Appendix B of this Draft EIR).[87] The Project would also include standby diesel generators, which would be used for emergencies. These generators would be tested on a monthly basis and comply with SCAQMD rules regarding distance to sensitive receptors. Specifically, Rule 1470 requires emergency generators greater than 750 horsepower that would be located within 50 meters of a sensitive receptor to reduce PM emissions from 0.15 grams per brake horsepower to 0.02 grams per brake horsepower (an 87-percent reduction in PM emissions).

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 warranting further study under the California Accidental Release Program (CalARP).

As discussed above, paint usage related to production support would be limited. While a spray booth is not contemplated as part of the Project, spray paint booths would be

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[86] *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.*

[87] *Gibson Transportation Consulting, Inc., Truck Trip Forecasts for the East End Studios Projects, Los Angeles, California, December 7, 2023.*

required to obtain necessary SCAQMD permits and comply with applicable rules (e.g., efficient paint sprayers and HEPA filtration with 99.97 percent PM_{10} filtration), which would reduce the potential for release of TAC emissions.

The Project would also allow catering trucks (e.g., food trucks) to access the site, which may generate emissions through cooking activities. However, most of the catering trucks would not be equipped with cooking equipment (i.e., charbroilers) since meals are often prepared off-site (e.g., sandwiches, salads). The Project could potentially include restaurant uses, which may use charbroilers or other cooking equipment. Project restaurant cooking operations would comply with SCAQMD Rule 1138, which limits emissions from cooking operations.

In addition, 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.

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 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, and potential TAC impacts would be less than significant.

Based on the above, the Project's on- and off-site localized construction and operational emissions would not exceed the SCAQMD LSTs. 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 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. 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 Section IV, Other CEQA Considerations, of this Draft EIR, and in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR, the Project would not create objectionable odors impacting a substantial number of people. **Thus, impacts with respect to Threshold (d) would be less than significant. No further analysis is required.**

e. Cumulative Impacts

(1) Impact Analysis

The following cumulative impacts analysis is based on the recommendations included in SCAQMD's *CEQA Air Quality Handbook*. 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. 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 operational air quality regional emissions, localized emissions, and TACs would not exceed any of the SCAQMD's recommended daily regional or localized thresholds, and, as such, the Project's operational air quality impacts would be less than significant. **Therefore, the emissions of non-attainment pollutants, O_3 precursors, and TACs generated by Project operation 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.

(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.