IV. Environmental Impact Analysis
B. Air Quality

1. Introduction

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Project and evaluates whether Project emissions would conflict with or obstruct implementation of the applicable air quality plan; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. This section relies on information included in the *Air Quality and Greenhouse Gas Appendix* provided in Appendix D 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 January 16, 2025.*

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

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

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

(2) Local Air Quality and Air Pollution Sources

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

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

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

Table IV.B-1
Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
Ozone (O_3)	1 hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8 hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM_{10})	24 hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter ($PM_{2.5}$)	24 hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	12 µg/m^3	12 µg/m^3		
Carbon MoNO$_X$ide (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/m^3 and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a 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.B-1 (Continued)
Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]

[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.*
[e] *An attainment re-designation request is pending.*
Source: Eyestone Environmental, 2025.

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

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

Air pollutant emissions within the Air Basin are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road

sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

(3) Air Pollutant Types

(a) Criteria Pollutants

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

(i) Ozone (O_3)

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

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

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter, PM_{10} and $PM_{2.5}$, consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, such as pollen and windstorms, are naturally occurring. However, in urban areas, such as the City, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. The human body naturally prevents the entry of larger particles into the body. However, small particles can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after

exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

(iii) Carbon MoNO$_X$ide (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 that it can act as a precursor to the formation of O_3.

(v) Sulfur Dioxide (SO_2)

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. Emissions of SO_2 aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness

of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants lead to higher rates of respiratory illness.

(vi) Lead (Pb)

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

(b) Additional Criteria Pollutants (California Only)

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

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

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

(ii) Hydrogen Sulfide (H_2S)

H_2S is a colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields. Industrial sources of H_2S include petrochemical plants and kraft paper mills. H_2S is also formed during bacterial decomposition of human and animal wastes and

is present in emissions from sewage treatment facilities and landfills.[4] Exposure to H_2S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.[5] H_2S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.[6]

(iii) Visibility-Reducing Particles

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

(iv) Vinyl Chloride

Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products and is generally emitted from industrial processes. Other major sources of vinyl chloride have been detected near landfills, sewage plants, and hazardous waste sites due to microbial breakdown of chlorinated solvents.[9] Short-term health effects of 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

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[4] *CARB, Hydrogen Sulfide & Health, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed January 16, 2025.*

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

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

[7] *CARB, Visibility-Reducing Particles and Health, ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed January 16, 2025.*

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

[9] *CARB, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed January 16, 2025.*

in humans.[10] Most health data on vinyl chloride relate to carcinogenicity; thus, the people most at risk are those who have long-term exposure to elevated levels, which is more likely to occur in occupational or industrial settings. However, control methodologies applied to industrial facilities generally prevent emissions to the ambient air.[11]

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

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

(i) VOCs

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

(ii) TACs

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

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[10] *CARB, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed January 16, 2025.*

[11] *CARB, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed January 16, 2025.*

consequently, ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

b. Regulatory Framework

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

- Federal Clean Air Act
  - National Ambient Air Quality Standards
- California Clean Air Act
  - California Ambient Air Quality Standards
- California Code of Regulations
- State Programs for Toxic Air Contaminants
- State Diesel Risk Reduction Program
- South Coast Air Quality Management District
  - Air Quality Management Plan
  - Air Quality Guidance Documents
  - Rules and Regulations
- Southern California Association of Governments Regional Transportation Plan/ Sustainable Communities Strategy
- City of Los Angeles Air Quality Element
- City of Los Angeles Plan for a Healthy Los Angeles
- City of Los Angeles Municipal Code

(1) Federal

(a) Federal Clean Air Act

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

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

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

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

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

[13] *USEPA, Summary of the Clean Air Act, www.epa.gov/laws-regulations/summary-clean-air-act, accessed January 16, 2025.*

[14] *USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, Last Updated January 3, 2017. www.epa.gov/clean-air-act-overview/clean-air-act-text, accessed January 16, 2025. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.*

(2) State

(a) California Clean Air Act

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

(b) California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by the 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) State Diesel Risk Reduction Program

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

(3) Regional

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

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

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

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

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

The 2022 AQMP also incorporates the transportation strategy and transportation control measures from the SCAG 2020–2045 RTP/SCS Plan.[18] SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS.

The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG.[19] The RTP/SCS

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

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

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

18 *SCAG, Final 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, adopted September 3, 2020.*

19 *SCAQMD, Final 2022 AQMP, December 2022, p. ES-4.*

and Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on the 2020–2045 RTP/SCS.

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

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

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

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

(b) SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the SCAQMD’s Governing Board in 1993) to provide local governments with guidance for

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

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

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

(c) SCAQMD Rules and Regulations

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

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[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 January 16, 2025.*

[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.*

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 three minutes in any one hour, which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.

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

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

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

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

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

- **Rule 1146.2—Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing

units to reduce NO_X emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

- **Rule 1186—PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM_{10} emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

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

Regulation XIV—Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units, which emit TACs or other non-criteria pollutants. The following is a list of rules, which 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 (CI) engines greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

(4) Local

(a) City of Los Angeles General Plan

(i) Air Quality Element

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. In general, the City of Los Angeles' General Plan (including the Framework, Air Quality, Transportation Element [Mobility Plan 2035], and the Health and Wellness Element [Plan for a Healthy Los Angeles]) and the City of Los Angeles' Green New Deal contain policies and programs for the protection of the environment and health through improved air quality. These serve to provide additional critical guidance for the betterment of public health for the region and the City.

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

The Air Quality Element establishes six goals:

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

(b) City of Los Angeles Municipal Code

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

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

Chapter IX of the LAMC, Section 99.04.106.8 provides exemptions from the requirements for cooking equipment contained within kitchens in a public use area, such as restaurants, commissaries, cafeterias, and community kitchens, as long as electrical infrastructure is installed. Gas-powered process equipment in institutions, such as hospitals, industrial, 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 has demonstrated an exceedance for Pb of the national standard, and an attainment redesignation for Pb is currently pending with the USEPA.

The SCAQMD has the responsibility for ensuring that all national and state ambient air quality standards are achieved and maintained throughout the Air Basin. To meet the standards, the SCAQMD has adopted a series of AQMPs. The 2022 AQMP includes strategies to ensure that rapidly approaching attainment deadlines are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions[26] sufficiently to meet the upcoming O_3 standard

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

deadlines. The 2022 AQMP provides a baseline year 2018 inventory of 351 tons per day (tpd) of NO_X and modeling results show that NO_X emissions are projected to be 184 tpd in the 8-hour O_3 attainment year of 2037, due to continued implementation of already adopted regulatory actions (baseline emissions).

The 2022 AQMP suggests that total Air Basin emissions of NO_X must be reduced to 60 tpd in 2037 to attain the 8-hour O_3 standard. Although the existing air regulations and programs will continue to lower NO_X emissions in the region, an additional 67 percent of reductions from the baseline year 2018 in the year 2037 is necessary to attain the 8-hour O_3 standard.[27,28]

The overall control strategy is an integral approach relying on fair-share emission reductions from federal, state and local levels. The 2022 AQMP is composed of stationary and mobile source emission reduction strategies from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with CARB and USEPA. The 2022 AQMP also includes transportation programs, measures, and strategies from SCAG's 2020–2045 RTP/SCS[29] that are generally designed to reduce VMT.

As discussed above, the 2022 AQMP forecasts the 2037 emissions inventories based on projected growth of a 12-percent growth in population, 17-percent growth in housing units, 11-percent growth in employment, and 5-percent growth in VMT between 2018 and 2037.

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

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

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

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

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

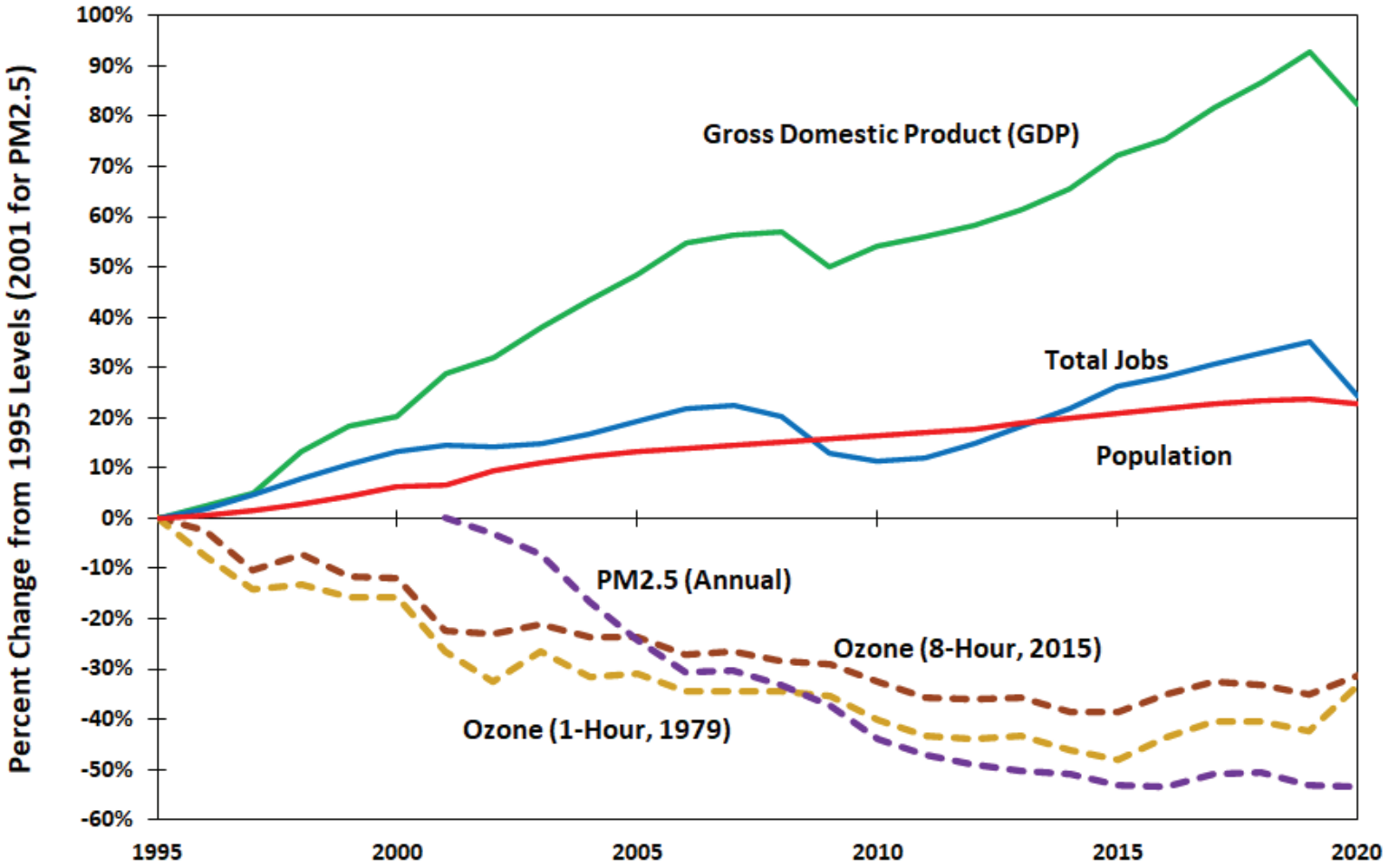

Figure IV.B-1
Ozone Trends

Source: AQMP, 2022.

The SCAQMD has released the Multiple Air Basin Toxics Exposure Study (MATES-V), which was aimed at estimating the cancer risk from toxic air emissions throughout the Air Basin by conducting a comprehensive monitoring program, an updated emissions inventory of TACs, and a modeling effort to fully characterize health risks for those living in the Air Basin.[31] The MATES-V study concluded that the average carcinogenic risk from air pollution in the Air Basin is approximately 424 in one million over a 70-year duration. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 50 percent of the risk is attributed to 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] Risk from less urbanized areas of the Air Basin ranges from less than 100 to 400 cancers per million. Generally, the risk from air toxics is lower near the coastline and higher risks are concentrated near large diesel sources (e.g., freeways, airports, and ports).

(2) Local Air Quality

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

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

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

[33] *SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), MATES V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=view_38, accessed January 16, 2025.*

(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.B-2 on page IV.B-26 shows the locations of the SRAs located in Los Angeles County. The Project Site is located within SRA 7, which covers the East San Fernando Valley area. The monitoring station closest to and most representative of the Project Site is the North Hollywood Station, located at 10659 W. Delano Street in the community of North Hollywood, approximately 3 miles north-east of the Project Site. Criteria pollutants monitored at this station include O_3 and NO_2. As the North Hollywood Station does not monitor for all criteria pollutants, the next closest monitoring station is the Reseda Station, located at 18330 Gault Street in the community of Reseda, approximately 8.8 miles northwest of the Project Site. Criteria pollutants monitored at this station include $PM_{2.5}$ and CO. The Los Angeles Station, located at 1630 North Main Street just north of Downtown Los Angeles, approximately 10.7 miles southeast of the Project Site, was selected to represent the remaining criteria pollutants. Criteria pollutants monitored at this station include PM_{10}, Pb, and SO_4^{2-}. Table IV.B-2 on page IV.B-27 identifies the national and state ambient air quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured at this station through the period of 2021–2023.

(b) Existing Health Risk in the Surrounding Area

As shown in Figure IV.B-3 on page IV.B-29, based on the MATES-V model, the calculated cancer risk in the Project area is approximately 410 in one million.[34] The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., from US-101). In general, the risk at the Project Site is comparable with other urbanized areas in Los Angeles.

(c) Surrounding Uses

The Project Site is located in an urbanized area that is developed with a mix of land uses. Ventura Boulevard, the major arterial in the immediate vicinity of the Project Site, is lined with commercial, institutional, and residential uses. Other major arterials in the Project Site vicinity include Laurel Canyon Boulevard, Moorpark Street, and Colfax Avenue, which are all generally lined with medium and high-density multi-family residential uses and commercial uses. Immediately west of the South Lot across Radford Avenue is a four-story apartment complex, an automobile repair shop, and a single-story, single-tenant restaurant building. To the west and south of the South Lot is a six-story (approximately 75-foot-high) office building located along Radford Avenue and Ventura Place. Farther west of the

[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.

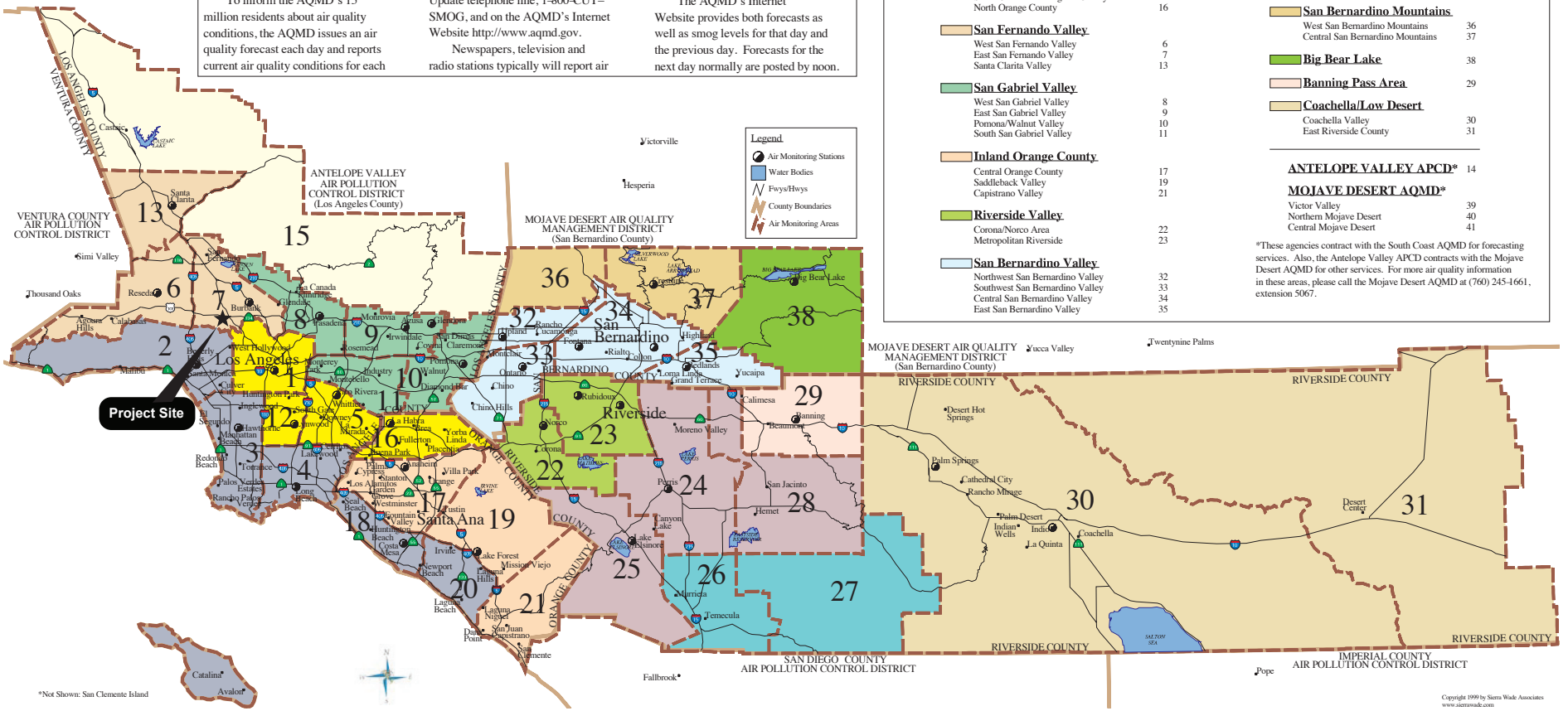

Figure IV.B-2
SCAQMD SRAs

Source: Sierra Wade Associates, 1999.

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

Pollutant	Year		
	2021	2022	2023
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.110	0.106	0.120
Days exceeding CAAQS (0.09 ppm)	6	6	11
Maximum 8-hour Concentration (ppm)	0.089	0.091	0.096
Days exceeding NAAQS (0.070 ppm)	17	13	25
Days exceeding CAAQS (0.07 ppm)	17	15	25
Respirable Particulate Matter (PM_{10})			
Maximum 24-hour Concentration (µg/m^3)	64	60	57
Days exceeding NAAQS (150 µg/m^3)	0	0	0
Days exceeding CAAQS (50 µg/m^3)	3	4	2
Annual Arithmetic Mean (µg/m3)	25.5	28.9	24.3
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)	55.5	20.5	21.9
Days exceeding NAAQS (35 µg/m^3)	3	0	0
Annual Arithmetic Mean (µg/m^3)	10.1	8.8	8.8
Does measured AAM exceed NAAQS (12 µg/m^3)?	No	No	No
Does measured AAM exceed CAAQS (12 µg/m^3)?	No	No	No
Carbon MoNO_Xide (CO)			
Maximum 1-hour Concentration (ppm)	2.6	2.2	2.3
Days exceeding NAAQS (35.0 ppm)	0	0	0
Days exceeding CAAQS (20.0 ppm)	0	0	0
Maximum 8-hour Concentration (ppm)	1.9	1.8	1.7
Days exceeding NAAQS and CAAQS (9 ppm)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.07	0.05	0.05
Days exceeding CAAQS (0.18 ppm)	0	0	0
Annual Arithmetic Mean (ppm)	0.01	0.01	0.01
Does measured AAM exceed NAAQS (0.0534 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
Sulfur Dioxide (SO_2)			
Maximum 1-hour Concentration (ppm)	0.002	0.006	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.B-2 (Continued)
Summary of Ambient Air Quality in the Project Vicinity

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

AAM = annual arithmetic mean
ppm = parts per million by volume
µg/m^3 = micrograms per cubic meter
N/A = Not available at this monitoring station.
Source: SCAQMD, Ambient Monitoring Data (2021–2023), www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed January 16, 2025.

South Lot is a neighborhood of several multi-family residential developments. Immediately west of the North Lot across Radford Avenue are various one-, two-, and three-story low- and medium-density single- and multi-family residential developments. Farther west of the North Lot is a neighborhood of several single-family residential developments. Low- and mid-rise commercial buildings and mini shopping centers occupied by general office uses, restaurants, retail, automobile repair shops, motels, and government uses are located south of the Project Site, across the abutting public alley and fronting Ventura Boulevard. Properties along the southern side of Ventura Boulevard are improved with similar uses. Farther to the south beyond Ventura Boulevard are three- and four-story multi-family residential buildings and Carpenter Community Charter School. To the north and east, the Project Site is bounded by the Tujunga Wash and Los Angeles River, respectively, which provide approximately 97-foot to 150-foot buffers from the residential uses across those channels. Many of the streets in the vicinity of the Project Site are lined with street trees.

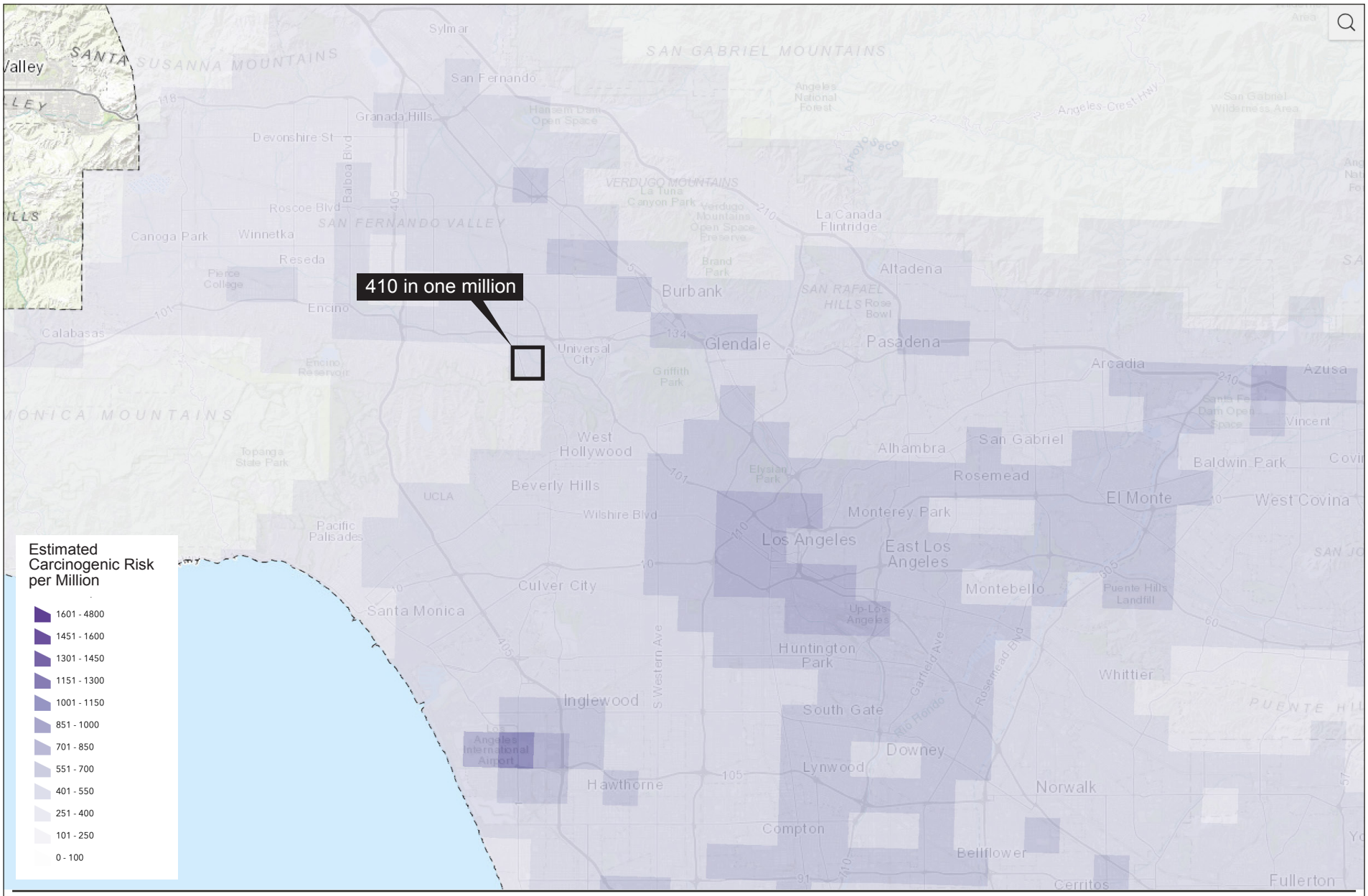

Figure IV.B-3
MATES V Total Cancer Risk for the Project Area

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 Project vicinity include residential uses discussed above and shown in Figure IV.B-4 on page IV.B-31. The closest sensitive receptors are residential uses located to the west across Radford Avenue. All other air quality sensitive receptors are located at greater distances from the Project Site and would be less impacted by Project emissions. Therefore, the Project's local (ambient) impacts are quantified only for the sensitive receptors depicted in Figure IV.B-4.

(e) Existing Project Site Emissions

The Project Site is currently improved with approximately 1,179,110 square feet of studio-related uses, including approximately 359,730 square feet of sound stages, 255,510 square feet of production support, 450,060 square feet of production office, and 113,810 square feet of general office. 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.B-3 on page IV.B-32 presents an estimate of the existing emissions currently generated by the uses on the Project Site.

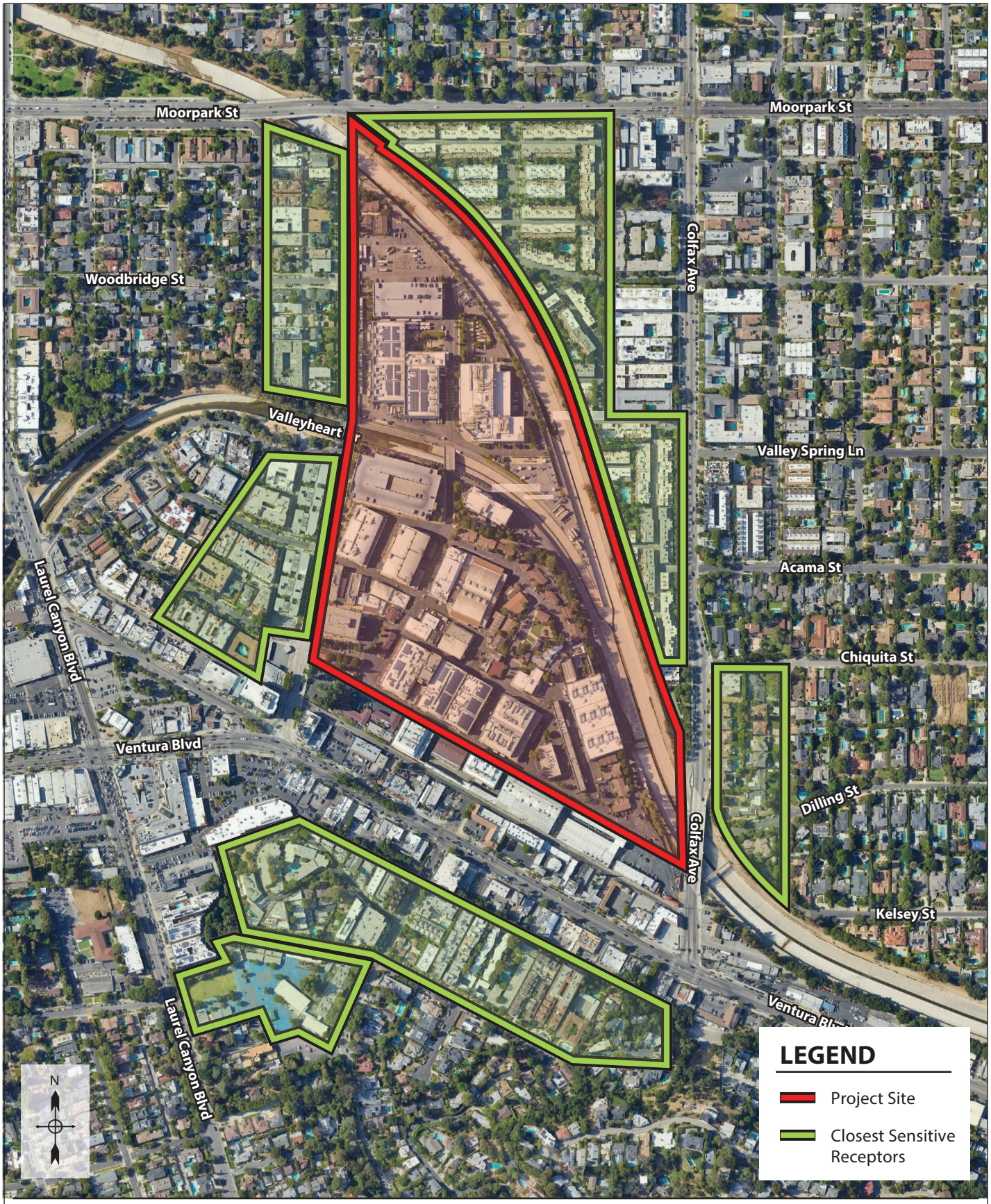

Figure IV.B-4
Air Quality Sensitive Receptors Locations

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

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

Emission Source	Emissions (pounds per day)[a]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Winter						
Area	29	<1	33	<1	<1	<1
Energy	<1	5	5	<1	<1	<1
Mobile	28	23	205	<1	38	10
Emergency Generators	<1	10	2	<1	<1	<1
Charbroilers	2	<1	<1	<1	4	2
On-site Trucks	<1	1	5	<1	1	<1
Total Existing Emissions	**60**	**40**	**250**	**1**	**44**	**14**
Summer						
Area	29	<1	33	<1	<1	<1
Energy	<1	5	5	<1	<1	<1
Mobile	29	21	219	<1	38	10
Emergency Generators	<1	10	2	<1	<1	<1
Charbroilers	3	<1	<1	<1	4	2
On-site Trucks	<1	1	5	<1	1	<1
Total Existing Emissions	**62**	**37**	**264**	**1**	**44**	**14**

Numbers may not add up exactly due to rounding.
[a] *Pollutant emissions are calculated using the CalEEMod emissions model.*
Source: Eyestone Environmental, 2025.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

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

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

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

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

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

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's *L.A. CEQA Thresholds Guide*, as appropriate and as presented below, to assist in answering the Appendix G Threshold questions.

(2) 2006 L.A. CEQA Thresholds Guide

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

(a) Construction

(i) Combustion Emissions from Construction Equipment

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

(ii) Fugitive Dust—Grading, Excavation and Hauling

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

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

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

(iv) Other Mobile Source Emissions

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

(b) Operation

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

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

- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The proposed project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 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.B-4 on page IV.B-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.B-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-hour threshold of 10.4 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.

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

Table IV.B-4
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds[a]		
Pollutant	**Construction[b]**	**Operation[c]**
NO_X	100 lbs/day	55 lbs/day
VOC[d]	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	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		
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) & 2.5 $\mu g/m^3$ (operation) 1.0 $\mu g/m^3$	
$PM_{2.5}$ 24-hour average	10.4 $\mu g/m^3$ (construction) & 2.5 $\mu g/m^3$ (operation)	
SO_2 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal—99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 $\mu g/m^3$ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	1.5 $\mu g/m^3$ (state) 0.15 $\mu g/m^3$ (federal)	

lbs/day = pounds per day

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

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

[c] *For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.*

[d] *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.*

Source: SCAQMD, 2019.

(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.B-4 on page IV.B-36.

- 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-hour 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.B-4 on page IV.B-36.

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

[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.*

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

(d) Consistency with Applicable Air Quality Plans

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with 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

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

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 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]

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

[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 January 16, 2025.*

In order to assist the CEQA practitioner in conducting an air quality analysis in the interim while the replacement *Air Quality Analysis Guidance Handbook* is being prepared, supplemental guidance/information is provided on the SCAQMD website and includes (1) EMFAC on-road vehicle emission factors, (2) background CO concentrations, (3) localized significance thresholds, (4) mitigation measures and control efficiencies, (5) mobile source toxics analysis, (6) off-road mobile source emission factors, (7) $PM_{2.5}$ significance thresholds and calculation methodology, and (8) updated SCAQMD Air Quality Significance Thresholds.[44] 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 air pollutant emissions through the use of heavy-duty construction equipment, such as excavators and cranes, and through vehicle trips generated from workers and haul and delivery trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment. Construction emissions can vary 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.

[44] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed on January 16, 2025.*

CalEEMod is based on outputs from Off-road Emissions Inventory Program model[45] (OFFROAD) and EMission FACtor model[46] (EMFAC), which are emissions estimation models developed by CARB, and used to calculate emissions from construction activities, including off- and on-road vehicles, respectively. CalEEMod also relies upon known emissions data associated with certain activities or equipment (often referred to as "default" data, values or factors) that can be used if site-specific information is not available. CalEEMod contains default values to use in each specific local air district region. Appropriate statewide default values can be used if regional default values are not defined.

The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. Construction tasks were aggregated to reflect overlapping tasks and identify the reasonably expected maximum construction emissions occurring over the course of Project construction. To be conservative, this analysis evaluates the Project's air quality impacts during construction based on reasonably expected maximum construction emissions even though such emissions would not occur throughout the entire construction phase.

The Project would require dewatering activities and treatment of potentially contaminated groundwater prior to and during excavation activities. The groundwater treatment system would be a closed loop with carbon filtration, which would limit emissions of VOCs to the atmosphere. However, minor amounts of VOCs may be emitted during servicing of the treatment system or changing of the filtration media. Emissions resulting from groundwater treatment are provided in Appendix D of this Draft EIR. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix D 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.[47] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, and

[45] *CARB, 2021 Off-road Diesel Emission Factors, https://arb.ca.gov/emfac/offroad/, accessed January 16, 2025.*

[46] *CARB, EMFAC 2021, https://arb.ca.gov/emfac/, accessed January 16, 2025.*

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

$PM_{2.5}$.[48] 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 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.B-4 on page IV.B-31, the closest sensitive receptors are residential uses located across Radford Avenue to the west. 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.

(2) Operation

(a) Regional Emissions

Analysis of the Project's impact on regional air quality during long-term Project operations (i.e., after construction is complete) takes into consideration four types of sources: (1) area, (2) energy, (3) mobile, and (4) stationary. Area source emissions are generated by, among other things, landscape equipment and the use of consumer products. Energy source emissions are generated as a result of activities in buildings for which natural gas is used (e.g., natural gas for cooking in commercial kitchens).[49] Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with

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

[49] *The Project's retail component may include restaurant and commissary uses. Natural gas consumption for restaurant cooking is exempt under the City's all-electric buildings ordinance.*

operation of the Project. Stationary source emissions are generated from charbroilers and emergency generators during routine maintenance/testing.

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

Similar to construction, SCAQMD's CalEEMod model was used to estimate Project emissions during operation. Mobile-source emissions were calculated using CalEEMod. The CalEEMod default for VMT was bypassed to account for the Project-related VMT provided in the Transportation Assessment for the Project (see Appendix O.1 of this Draft EIR), which was conducted consistent with Los Angeles Department of Transportation's (LADOT) *Transportation Assessment Guidelines*.[50] 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.[51] Area source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Charbroiler and emergency generator emissions are calculated based on the SCAQMD Annual Emissions Reporting (AER) methodology.[52] The existing site is required to submit to the SCAQMD an annual emissions report, which identifies permitted uses, usage rates, and emissions on an annual basis.

In order to provide a conservative analysis of the Project's operational emissions, existing buildings to remain were assumed to consume natural gas, which would result in higher criteria pollutant emissions in comparison to buildings in compliance with Ordinance No. 187,714 or Project Design Feature GHG-PDF-1. Natural gas usage factors in CalEEMod are based on the California Energy Commission California Commercial End Use Survey data

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[50] *Gibson Transportation Consulting, Inc., Transportation Assessment for the Radford Studio Center Project, Studio City, California, July 2024, revised January 2025. Refer to Appendix O.1 of this Draft EIR.*

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

[52] *SCAQMD Annual Emissions Reporting Guideline Documents, www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting#guidelinedocs, accessed January 16, 2025.*

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 USEPA'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.[53] Existing truck counts and operational truck trip estimates are provided in Appendix D 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 remain consistent with existing conditions even though the area of sound stage and production support uses would increase. Based on the most recent annual emission reports submitted to the SCAQMD, paint usage is approximately 12 gallons per year.[54] The proposed uses are not anticipated to include spray paint booths or increase usage beyond what is currently consumed on-site. Therefore, the incremental increase in emissions resulting from spray paint usage is expected to be minimal.

The Project may allow catering trucks to access the Project Site and provide meals for studio operations, consistent with existing conditions. Air 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 four catering trucks equipped with a charbroiler and griddle per day on average to support studio operations. The Project could also potentially have restaurant uses that could include charbroilers or griddles.

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

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53 *Gibson Transportation Consulting, Inc., Truck Trip Forecasts for the Radford Studio Center Project, Studio City, California, July 2024, revised January 2025. Refer to Appendix O.1 of this Draft EIR.*

54 *South Coast Air Quality Management District FINDS database, https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=101520, accessed January 16, 2025.*

significance thresholds.[55] 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 operational emissions associated with existing uses that would be removed to accommodate the Project. 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 emissions standards for future years. Refer to Appendix D 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.[56]

It has been recognized that CO exceedances are caused by vehicular emissions,[57] primarily when idling at intersections.[58,59] Accordingly, vehicle emissions standards have become increasingly more stringent. Before the first vehicle emission regulations, cars in

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[55] *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).*

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

[57] *USEPA, Air Quality Criteria for Carbon MoNO$_X$ide, EPA 600/P-099/001F, 2000.*

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

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

the 1950s were typically emitting about 87 grams of CO per mile.[60] 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,[61,62] and new cold weather CO standards have been implemented, effective for the 1996 model year.[63] Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (with provisions for certain cars to emit even less).[64] 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 MoNO$_X$ide (1992 CO Plan).[65] 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 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

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60 *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 January 16, 2025.*

61 *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].*

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

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

64 *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.*

65 *SCAQMD, Federal Attainment Plan for Carbon MoNO$_X$ide, 1992.*

day.[66] The AQMP CO hotspots modeling also took into account 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.[67,68] 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 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).[69] SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.[70] Given that Page 2-4 of the SCAQMD guidance states that "the potential for public health impacts remains unchanged when siting sensitive receptors near a pollution source or a pollution source near a sensitive receptor," and has adopted similar siting distances from the CARB Handbook, the City as Lead Agency has elected to use the siting distances in Table 1-1 of the CARB Handbook for evaluating health risk impacts from TAC sources on sensitive uses. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources and evaluating the potential for such sources to cause significant TAC impacts. This qualitative evaluation also takes into account the Project's potential source of TAC emissions and distance to sensitive receptors based on CARB siting distances. If the qualitative evaluation does not rule out significant impacts from a new TAC source, or modification of an existing TAC emissions source, a more detailed analysis is conducted.

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

67 *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.*

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

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

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

For the detailed analysis, downwind sensitive receptor locations are identified, and site-specific dispersion modeling is conducted to estimate Project impacts.

c. Project Design Features

No specific project design features are proposed with regard to air quality. However, the Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment, and is consistent with the requirements of Ordinance No. 187,714. In addition, as part of the Project, the Applicant would incorporate Project features to support and promote environmental sustainability by complying with all applicable State and local regulatory requirements, including the provisions set forth in the City's Green Building Ordinance. While these features are designed primarily to reduce GHG emissions, they would also serve to reduce air pollutant emissions discussed herein.

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

The Project represents an infill development located in close proximity to existing transit lines and would utilize existing infrastructure to serve the proposed uses. As such, the Project would advance regional goals to reduce VMT through infill development near transit that would reduce air pollutant emissions compared to an average regional project. The Project also involves the re-use of certain existing buildings and facilities. Both in compliance with and, in some cases, in exceedance of the CALGreen Code and LAMC requirements, a number of specific sustainable design components would be incorporated into the Project, including, but not limited to, Energy Star appliances, solar panels, green walls in some outdoor areas, vegetated roofs or cool roof systems to help reduce energy use, short- and long-term bicycle parking, EV charging infrastructure, a Transportation Demand Management (TDM) Program, proposed Mobility Hubs, and use of daylighting where feasible. Such sustainable design components would address energy conservation and serve to reduce air pollutant emissions.

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.

The Project's maximum potential NO_X, CO, PM_{10}, and $PM_{2.5}$ daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table IV.B-10 on page IV.B-77 in the discussion of Threshold (c) below, the Project's maximum construction emissions would not exceed the SCAQMD-recommended localized screening thresholds for NO_2 (as NO_X) and CO but would exceed the SCAQMD-recommended localized screening thresholds for PM_{10} and $PM_{2.5}$. However, as shown in Table IV.B-11 on page IV.B-81 further below, PM_{10} and $PM_{2.5}$ emissions would be reduced below the SCAQMD-recommended LSTs with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4.

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.[71] As discussed 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.

An analysis of potential localized operational impacts from on-site activities was also conducted. As shown in Table IV.B-10 on page IV.B-81 further below, localized NO_2 (as NO_X), CO, PM_{10}, and $PM_{2.5}$ operational emissions would not exceed the LSTs, and impacts would be less than significant.

(ii) Criterion 2

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

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

A project is consistent with the 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.J, 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.

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

The individual Community Plans within the City comprise the land use element of the City's General Plan. The Project Site is located within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area, which encourages commercial developments along commercial corridors in the area.[72]

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.

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.[73] In 2028, the earliest occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,967,307 employees.[74]

Based on employee generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 4,139 net new employees, which would constitute approximately 8.35 percent of the employment growth forecasted between 2023 and 2028 (approximately 49,586 employees) based on the 2020–2045 RTP/SCS.[75,76] With regard to consistency with growth projections for the 2024–2050 RTP/SCS, the estimated employment generated by the Project would represent approximately 13.97 percent of the projected employment growth in the SCAG Region between 2023 and 2028.[77] Therefore, the Project's contribution to population and

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[72] *City of Los Angeles, Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, Objective 2-1.1, p. III-6.*

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

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

[75] *Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions. A custom employee number was applied to the current studio uses. As such, the existing uses generate approximately 4,781 employees. With regard to proposed uses, the employee generation rate of 0.004 employee per square foot for "High Turnover (Sit Down Restaurant)" land use is applied to the 25,000 square feet of proposed restaurant, and custom employee number for the studio uses. As documented in Appendix D, VMT Analysis Worksheets, of the Project's Transportation Assessment (Appendix O.1 of this Draft EIR), the Project would generate approximately 8,920 new employees. Therefore, the Project would result in a net generation of 8,920–4,781 = 4,139 employees.*

[76] *Project's net increase in employees (4,139) ÷ Increase in employment in City of Los Angeles subregion from 2023 to 2028 (49,586) = 8.35 percent.*

[77] *Project's net increase in employees (4,139) ÷ Increase in employment in City of Los Angeles subregion from 2023 to 2028 (29,629) = 13.97 percent.*

employment growth would be also consistent with projections contained in the 2020–2045 RTP/SCS.

As discussed previously, the 2022 AQMP is based on the 2020–2045 RTP/SCS, which incorporates data from General Plans, as well as local land use data, such as the 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.) required by SCAQMD, as summarized above. The Project also would incorporate pollutant reduction measures discussed in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR, to support and promote environmental sustainability. While these latter features are designed primarily to reduce GHG emissions, they would also reduce emissions of the criteria pollutants discussed herein. Furthermore, implementation of Mitigation Measure AIR-MM-1, which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards, and Mitigation Measure AIR-MM-2, which requires the use of soil stabilizers and gravel roads during demolition and grading/excavation activities and concrete delivery trucks during concrete mat foundation pours, set forth below, would reduce localized air quality impacts to less-than-significant levels.

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 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 Mitigation Measure AIR-MM-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. As such, the Project meets this AQMP consistency criterion.

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

With regard to land use developments, such as the Project, the AQMP's land use policies focus on the reduction of vehicle trips and VMT. As discussed in Section IV.J, 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) as designated by the 2020–2045 RTP/SCS and a Livable Corridor/High Quality Transit Corridor (HQTC) as designated by the 2024–2050 which are areas with higher access to public transportation reducing vehicle trips and VMT.[78,79]

There are various local, limited stop and rapid bus routes in the immediate vicinity of the Project Site. There are four local bus routes, including three Metro bus lines and one LADOT DASH route, which run within 0.25 miles of the Project Site. The Project would also include Mobility Hubs, which would provide an off-street space for passenger pick-up/drop-off and the temporary parking of buses, carpools, vanpools, shuttles, ride-share, taxi, and other commercial and non-commercial vehicles. The Mobility Hubs would include space to accommodate support uses, storage, maintenance, staging facilities, bike share, and ridership amenities.

As further discussed in Section IV.G, 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 pollutants discussed herein. These relative reductions in vehicle trips and VMT from a standard project within the Air Basin help quantify the criteria pollutant emissions reductions achieved by locating the Project in an infill site within an HQTA and Livable Corridor/HQTC 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

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[78] *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.*

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

and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the USEPA Mixed--Use Development (MXD) model to calculate trip reductions for multi-use developments.[80] 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 D, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a 14-percent reduction in overall VMT and resultant pollutant emissions compared to the baseline ITE trip generation rates.[81]

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 (after mitigation as presented in the discussion of Threshold (c) below), 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 and the analysis of the Project's consistency with these goals, objectives, and policies are presented in Table IV.B-5 beginning on page IV.B-55. The Project would promote these Air Quality Element goals, objectives, and policies. Specifically, the Project would provide for Mobility Hubs, which would contain short-term and long-term bicycle parking spaces, as well as shuttles to reduce vehicle trips. The Project would provide 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 particular, the Radford Bridge would provide pedestrian and bicycle routes across the Tujunga Wash, as well as ramps and/or stairs to provide direct access to the Los Angeles River trail system. 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 D, incorporation of these VMT reduction features applicable to the Project would result in a 14-percent reduction in overall VMT compared to the baseline

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[80] *USEPA, Mixed-Use Trip Generation Model. www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed on January 16, 2025.*

[81] *Please refer to Appendix D-2 of this Draft EIR for VMT Calculations.*

Table IV.B-5
Project's Potential Conflict 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 businesses and visitors by developing a 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 2020–2045 RTP/SCS growth projections, which are used in preparing the 2022 AQMP. The growth projections in the SCAG 2024–2050 are similar to the growth projections in the SCAG 2020–2045 RTP/SCS. The Project includes bicycle parking spaces for the proposed uses as required by the LAMC and is well-served by transit, including local and regional bus lines. The Project would also provide multi-modal transportation solutions to connect with surrounding public transit lines, encourage alternative means of transportation, and focus growth in a high-density area in close proximity to transit and housing. The Project proposes the construction of a new multi-modal bridge, the Radford Bridge, extending from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street. This new bridge would provide pedestrian and bicycle routes across the Tujunga Wash and include a new studio-related vehicle access, as well as ramps and/or stairs to provide direct access to the Los Angeles River trail system. The new bridge would encourage alternative modes of transportation (walking/biking) to and from the site, potentially reducing VMT. The Project would, thus, reduce air emissions and increase traffic mobility while also sustaining economic growth.
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.	**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

Table IV.B-5 (Continued)
Project's Potential Conflict with City of Los Angeles General Plan Air Quality Element

Goals, Objectives, and Policies	Would the Project Conflict?
Policy 1.3.1: Minimize particulate emission from construction sites.	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. Thus, the Project would reduce particulate emissions emanating from unpaved areas, parking lots, and construction sites.
Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**No Conflict.** The Project Site is located in an HQTA and Livable Corridor/HQTC, in close proximity to residential, restaurants, retail, and commercial uses, thereby reducing the VMT for future employees because employees have the opportunity to walk or bike to work and access dining and shopping opportunities in the vicinity of the Project Site. The Project would implement a robust TDM Program to promote and provide employees and visitors with opportunities to utilize alternative transportation modes and reduce the number of single-occupant vehicle trips to and from the Project Site. The Project's TDM Program would include, among other things, an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service that would connect to mass transit stops, a ride-share matching and carpool/vanpool program, first-mile/last-mile options, and a Guaranteed Ride Home program. Future employees on the Project Site would also have access to local bus lines, as well as use of bicycle parking spaces provided on the Project Site. The Project's proximity to other commercial and residential uses, as well as options for the use of alternative modes of transportation, would reduce reliance on single-occupant vehicles because employees have the opportunity to walk or bike to work and access dining and shopping opportunities in the vicinity of the Project Site. 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.** As discussed above under Goal 2, the Project would include an extensive TDM Program that would reduce single-occupant vehicle trips and VMT and promote alternative transportation modes. Further, the Project would be served by multiple local bus lines within 0.25 miles of the Project Site. The accessibility of public 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 additional 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

Table IV.B-5 (Continued)
Project's Potential Conflict with City of Los Angeles General Plan Air Quality Element

Goals, Objectives, and Policies	Would the Project Conflict?
	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 implement a robust TDM Program to encourage and provide employees and visitors with opportunities to utilize alternative transportation modes and reduce VMT and the number of single-occupant vehicle trips to the Project Site. The Project's TDM Program would include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service, a ride-share matching and carpool/vanpool program, first-mile/last-mile options, and a Guaranteed Ride Home program. The on-site coordinator would reach out to employees directly to promote the benefits of the TDM Program and would provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, rideshare/carpool/vanpool programs, and parking incentives. Further, the Project 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 603 bicycle parking spaces, including 230 short-term spaces and 373 long-term spaces. The Project would include sufficient parking to meet the needs of employees and visitors at the Project Site, which would be accessible from all of the signalized driveways. 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 involves the continuation of the existing studio use, which has been in operation since the 1920s. The Project Site is located in an urbanized area that is developed with a diverse mix of land uses. Ventura Boulevard, the major arterial in the immediate vicinity of the Project Site, is lined with commercial, institutional, and residential uses. Other major arterials in the Project Site vicinity include Laurel Canyon Boulevard, Moorpark Street, and Colfax Avenue, which are all generally lined with medium- and high-density multi-family residential uses and commercial uses. The Project would reduce VMT and air emissions by providing multi-modal transportation solutions, including on-site Mobility Hubs, to connect with surrounding public transit lines, encourage alternative modes of transportation, and focus growth in a high-density area in close proximity to transit and housing, resulting in minimal impact of existing land use patterns and the proposed expansion of the existing studio. 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	**No Conflict.** The analysis of the Project's potential air quality impacts relied upon the numeric indicators by the

Table IV.B-5 (Continued)
Project's Potential Conflict with City of Los Angeles General Plan Air Quality Element

Goals, Objectives, and Policies	Would the Project Conflict?
ambient air quality standards as a primary consideration in land use planning.	SCAQMD, which considers attainment of the ambient air quality standards. As discussed above, the Project's land use and transportation characteristics, its commitments, and its location, which have been primarily considered in the City's land use planning, would reduce VMT and mobile air emissions. As such, the Project would not conflict with this objective.
Policy 4.1.2: Ensure that project level review and approval of land use development remain at the local level.	**No Conflict.** The Project environmental review and approval would occur at the local level. This Project-level EIR is being conducted by the City pursuant to CEQA requirements prior to the City's taking discretionary action on the Project (i.e., approval or denial of the Project).
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.** Refer to the discussion of Project consistency with Goal 2, Objective 2.1 and Policy 2.1.1, above.
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 to a large generator of employment by expanding the existing studio, which is located in close proximity to residential areas and local-serving retail and restaurants in an urban area. The Project is located near bus stops served by local bus lines. The Project also includes development of the Mobility Hubs that would act as a central location for Project employees and visitors to access convenient and multi-modal transportation services. Pedestrian and bicycle access to transit services would be enhanced with the new Radford Bridge, Class IV bikeways, and additional landscaping, sidewalk, and crosswalk improvements adjacent to the Project Site. 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 enhance the Project Site frontages through sidewalk improvements, including the widening of sidewalks where necessary and consistent with Mobility Plan standards; installation of new street trees and landscaping, lighting, wayfinding signage; and provision of pedestrian amenities, such as benches. Moreover, the Project would include safe, delineated pathways for pedestrians throughout the Project Site. The Project would also enhance public access to the Los Angeles River and Tujunga Wash by providing a protected bikeway along Radford Avenue consistent with the City's 2010 Bicycle Plan. In addition, the Project would provide 603 bicycle parking spaces on-site, including 230 short-term spaces and 373 long-term spaces. The Project would also provide secure on-site bicycle parking facilities and amenities and dedicated pedestrian entries. Additionally, the Project is located within a 0.25-mile walking distance to bus stops served by local bus lines, thereby providing Project employees and visitors with public transportation alternatives. The Project would also

Table IV.B-5 (Continued)
Project's Potential Conflict with City of Los Angeles General Plan Air Quality Element

Goals, Objectives, and Policies	Would the Project Conflict?
	comply with City requirements for providing EV charging capabilities and EV charging stations within the proposed parking areas to encourage the use of alternative fuel vehicles. 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.** Refer to the discussion of Project consistency with Goal 2, Objective 2.1 and Policy 2.1.1, above.
Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.	**No Conflict.** The Project's location, land use characteristics, and Project design features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be consistent with the relevant SCAG policies in the RTP/SCS that promote a reduction in VMT by locating new development on infill sites, which is one of the key strategies in reducing fuel use through land use and transportation planning. 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 lines. Moreover, the Project would install EV charging stations in accordance with LAMC requirements. The Project would incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen Code. Specifically, both in compliance with and, in some cases, in exceedance of LAMC requirements, a number of specific sustainable design components would be incorporated into the Project. These features include, but are not limited to, Energy Star appliances; solar panels; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; energy-efficient lighting; and permeable paving, where appropriate. The Project would also include features that would utilize passive methods for conservation such as weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; and use of daylighting, where feasible. The Project would also be designed to meet LEED Gold or equivalent green building standards

Table IV.B-5 (Continued)
Project's Potential Conflict with City of Los Angeles General Plan Air Quality Element

Goals, Objectives, and Policies	Would the Project Conflict?
	and would comply with the City's All-Electric Buildings Ordinance (Ordinance No. 187,714), as applicable.
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**. Refer to the discussion of Project consistency with Goal 5.
Policy 5.1.4: Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**No Conflict.** The Project would comply with all applicable City regulations that promote waste reduction and recycling.
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. Further, as discussed below, the Project would comply with Mitigation Measure AIR-MM-1, which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards, and Mitigation Measure AIR-MM-5, which requires the use of all-electric landscaping equipment. The Project would also be designed to meet LEED Gold or equivalent green building standards and would comply with the City's All-Electric Buildings Ordinance (Ordinance No. 187,714), as applicable.

Source: Eyestone Environmental, 2025.

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.

Based on the above, the Project would not conflict with applicable policies of the Air Quality Element. Refer to Section IV.J, 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.[82] As such, impacts to Threshold (a) would be less than significant.

(2) Mitigation Measures

Project-level impacts related to Threshold (a) during construction of the Project would be significant prior to mitigation, as Project construction would exceed the SCAQMD-recommended LSTs for PM_{10} and $PM_{2.5}$. As discussed below under Threshold (c), these localized construction impacts would be reduced to a less-than-significant level with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-2, detailed below. Emissions would be further reduced with the inclusion of Mitigation Measures AIR-MM-3 through AIR-MM-4.

Project-level impacts related to Threshold (a) during operation of the Project were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to Threshold (a) during construction of the Project would be less than significant with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-2, as discussed further below under Threshold (c). Emissions would be further reduced with the inclusion of Mitigation Measures AIR-MM-3 through AIR-MM-4.

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

Threshold (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?

[82] *Criterion 1 of the AQMP consistency analysis is focused on localized impacts and not regional. The analysis demonstrates under Criterion 1 that localized impacts would be less than significant (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).*

(1) Impact Analysis

(a) Regional Emissions

(i) Construction

Project buildout may occur in one phase, with a total construction period of approximately 39 months. Construction could begin as soon as 2025 and end as soon as 2028. However, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045.[83] As discussed further below, this analysis of regional emissions assumes a 2028 buildout year to provide a conservative evaluation. Construction activities could occur Monday through Friday from 7:00 A.M. to 9:00 P.M. and between 8:00 A.M. and 6:00 P.M. on Saturday or national holidays, in accordance with LAMC requirements.

Earthwork activities necessary for construction would require an estimated 935,000 cubic yards of cut, 55,000 cubic yards of fill, and 880,000 cubic yards of net export.[84] In accordance with the LADOT included as Appendix Q.3 of this Draft EIR, hauling activities would occur between the hours of 9:00 A.M. and 4:00 P.M. on weekdays, as well as between 8:00 A.M. and 4:00 P.M. on Saturdays. In addition, haul routes using the intersection of Colfax Avenue and Moorpark Street during the weekday would be limited to the hours of 9:00 A.M. and 1:30 P.M. Hauling activities between 7:00 A.M. and 9:00 A.M. would require approval from the Bureau of Engineering District Engineer per LAMC Section 62.61. Exported soil materials likely would be disposed of at Sunshine Canyon Landfill in Sylmar via US-101, west to I-405, and north to I-5, or at Chiquita Canyon Landfill via US-101, west to I-405, north to I-5, and to SR-126. As a conservative assumption, the Chiquita Canyon Landfill was assumed for the analysis as the distance traveled is farther than Sunshine Canyon Landfill.[85] Construction delivery/haul trucks would travel on approved truck routes between the Project Site and US-101 via the following optional routes:

- **Incoming Truck Route 1:** Incoming trucks would exit US-101 at Laurel Canyon Boulevard, head south on Laurel Canyon Boulevard, turn left on Ventura Boulevard heading east, and turn left on Colfax Avenue, where trucks would enter the Project Site at the Colfax Gate.

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[83] *Construction would not occur continuously over the 20-year term and buildings could be constructed in phases at any time over this term.*

[84] *All earthwork volumes include estimates for both rough grading and over-excavation.*

[85] *As discussed in Section IV.O.3, Utilities and Service Systems—Solid Waste, of this Draft EIR, the Chiquita Canyon Landfill has recently stopped accepting solid waste on January 1, 2025. This does not affect the GHG analysis included herein because as stated here, distance to this landfill was used because it provides a conservative analysis.*

- **Incoming Truck Route 2:** Incoming trucks would exit US-101 at Laurel Canyon Boulevard, head south on Laurel Canyon Boulevard, turn left on Moorpark Street heading east, turn right on Colfax Avenue heading south, and enter the Project Site at the Colfax Gate.

- **Incoming Truck Route 3:** Incoming trucks would exit US-101 at Laurel Canyon Boulevard, head south on Laurel Canyon Boulevard, turn left on Ventura Boulevard heading east, and turn left on Carpenter Avenue into the Carpenter Gate.

- **Incoming Truck Route 4:** Incoming trucks would exit US-101 at Laurel Canyon Boulevard, head south on Laurel Canyon Boulevard, turn left on Moorpark Street heading east, turn right on Colfax Avenue heading south, turn right on Ventura Boulevard heading west, and turn right on Carpenter Avenue into the Carpenter Gate.[86]

- **Incoming Truck Route 5:** Incoming trucks would exit US-101 at Laurel Canyon Boulevard, head south on Laurel Canyon Boulevard, turn left on Ventura Boulevard heading east, turn left onto Radford Avenue and enter the Project Site at the Radford Gate.

- **Incoming Truck Route 6:** Once the Radford Bridge is complete, incoming trucks could exit US-101 at Laurel Canyon Boulevard, head south on Laurel Canyon Boulevard, turn left on Moorpark Street heading east, and turn right on Radford Avenue to enter the Project Site entrance within the northern portion of the Project Site.

- **Outgoing Truck Route 1:** Outgoing trucks would exit the Project Site at the Colfax Gate, turn right on Colfax Avenue heading south, turn right on Ventura Boulevard heading west, turn right on Laurel Canyon Boulevard heading north and then enter US-101.

- **Outgoing Truck Route 2:** Outgoing trucks would exit the Project Site at the Colfax Gate, turn left on Colfax Avenue heading north, turn left on Moorpark Street heading west, turn right on Laurel Canyon Boulevard heading north and then enter US-101.

- **Outgoing Truck Route 3:** Outgoing trucks would exit the Project Site at Carpenter Avenue, turn right on Ventura Boulevard heading west, turn right on Laurel Canyon Boulevard heading north and then enter US-101.

- **Outgoing Truck Route 4:** Outgoing trucks would exit the Project Site at the Carpenter Gate, turn left on Ventura Boulevard heading east (or alternatively turn left on the public alley heading east), turn left on Colfax Avenue heading north,

[86] *The Capenter Gate would be added after the demolition of buildings along the alley.*

turn left on Moorpark Street heading west, turn right on Laurel Canyon Boulevard heading north and then enter US-101.

- **Outgoing Truck Route 5:** Outgoing trucks would exit the Project Site at the Radford Gate heading south on Radford Avenue, turn right on Ventura Place heading west, turn right on Laurel Canyon Boulevard heading north and then enter US-101.

- **Outgoing Truck Route 6:** Once the Radford Bridge is complete, loaded trucks could exit the northern portion of the Project Site at Radford Avenue, turn left on Moorpark Street, turn right on Laurel Canyon Boulevard heading north and then enter US-101.

Any hazardous soil materials would be exported to the Buttonwillow Landfill located in Kern County using the same local roadways, as discussed above.

As construction air quality impacts are evaluated on a worst-case day, the shorter construction duration (2025–2028) would assume more intensive activities, as well as overlapping activities, on a daily basis. Therefore, as a conservative assumption, it was assumed that construction would be completed by 2028. Furthermore, as discussed below, the proposed Specific Plan would provide limited development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. The overall maximum square footage of development and earthwork activities would remain the same under any potential buildout scenario. As such, the construction emissions provided below would be representative of any permitted development scenario.

Project construction may occur in a single phase with multiple overlapping construction phases (e.g., demolition, grading and foundation, building construction), with buildout expected to be completed in 2028. 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 39 months. Based on SCAQMD factors, the construction equipment and truck fleet mix would emit less pollution in future years due to more stringent emissions control regulations. As construction activities for the Project are evaluated based on an earlier start date, the emissions presented are more conservative.

The analysis also takes into account off-site improvements described in Section II. Project Description. Such off-site improvements include new driveways, curb, gutter and sidewalk along Colfax avenue, repaving of the street and similar improvements to Radford Avenue. An improved entrance at Carpenter Avenue would be constructed and may include

undergrounding of power poles and overhead lines. Construction activities and emissions associated with off-site improvements are included in Appendix D of this Draft EIR.

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. The 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 D (CalEEMod Construction Output file).

As presented in Table IV.B-6 on page IV.B-66, construction-related daily maximum regional construction emissions would exceed SCAQMD daily significance thresholds for NO_X. **Therefore, the regional construction emissions associated with the Project would potentially result in a short-term significant impact related to NO_X.**

(ii) Operation

As discussed above, SCAQMD's CalEEMod was used to calculate area-, energy-, mobile-, and stationary-source emissions. For purposes of the air quality analysis, Project characteristics incorporated in this analysis include the Project Site's increase in accessibility to transit and increase in diversity of uses. The Project would incorporate Project design features to promote environmental sustainability, which are discussed in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR.

As shown in Table IV.B-7 on page IV.B-67, regional operational emissions for the Project would not exceed any of the SCAQMD's daily regional operational thresholds. Therefore, regional operational emissions generated by the Project would result in a less-than-significant air quality impact.

The proposed Specific Plan would provide limited development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Accordingly, the Specific Plan would allow for the limited exchange of two of the permitted studio land uses (increases permitted only for sound stage and production support

Table IV.B-6
Estimate of Maximum Regional Project Daily Construction (Unmitigated) Emissions—39-Month Buildout (2028) (pounds per day)[a]

Construction Year	VOC[b]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Construction Emissions Winter						
Year 2025	6	168	105	1	78	15
Year 2026	38	161	179	1	78	15
Year 2027[d]	39	95	190	0	50	11
Year 2028[d]	39	92	186	0	50	11
Maximum Construction Emissions[c]	39	168	190	1	78	15
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(36)**	**68**	**(360)**	**(149)**	**(72)**	**(40)**
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**
Regional Construction Emissions Summer						
Year 2025[e]	0	0	0	0	0	0
Year 2026	43	228	282	1	121	25
Year 2027[d]	39	92	206	0	50	11
Year 2028[d]	38	87	180	0	38	9
Maximum Construction Emissions[c]	43	228	282	1	121	25
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(32)**	**128**	**(268)**	**(149)**	**(29)**	**(30)**
Exceed Threshold?	**No**	**Yes**	**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 D (CalEEMod Output) of this Draft EIR.*

[b] *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.*

[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 exporting loads prior to transport.*

[d] *Emissions include off-site improvements.*

[e] *Construction years, which show zero emissions, indicate that no construction activities are occurring during the year and season (e.g., Summer 2025).*

Source: Eyestone Environmental, 2025.

Table IV.B-7
Estimate of Maximum Regional Project Daily Operational Emissions (Proposed Development Program)—At Project Buildout (2028)[a]

Emission Source	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Winter[b]						
Area	29	<1	33	<1	<1	<1
Energy (Natural Gas)[c]	<1	5	5	<1	<1	<1
Mobile	22	16	155	<1	38	10
Emergency Generators	<1	10	2	<1	<1	<1
Charbroilers	3	<1	<1	<1	4	2
On-site Trucks	<1	<1	5	<1	1	<1
Total	55	32	200	1	44	14
Project Winter						
Area	54	<1	65	<1	<1	<1
Energy (Natural Gas)[c,d]	<1	3	3	<1	<1	<1
Mobile	47	33	325	<1	79	20
Emergency Generators	<1	10	4	<1	<1	<1
Charbroilers	3	<1	<1	<1	7	4
On-site Trucks	<1	2	14	<1	3	<1
Total	106	49	411	2	89	26
Project less Existing Winter						
Area	26	<1	32	<1	<1	<1
Energy (Natural Gas)[c,d]	<1	<1	<1	<1	<1	<1
Mobile	25	17	170	<1	41	11
Emergency Generators	<1	<1	2	<1	<1	<1
Charbroilers	<1	<1	<1	<1	2	1
On-site Trucks	<1	1	9	<1	1	<1
Total Proposed Uses Emissions	51	16	211	<1	45	12
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(4)**	**(39)**	**(339)**	**(150)**	**(105)**	**(43)**
Exceed Threshold?	No	No	No	No	No	No
Existing Summer[b]						
Area	29	<1	33	<1	<1	<1
Energy (Natural Gas)[c]	<1	5	5	<1	<1	<1
Mobile	23	14	165	<1	38	10
Emergency Generators	<1	10	2	<1	<1	<1
Charbroilers	3	<1	<1	<1	4	2
On-site Trucks	<1	<1	5	<1	1	<1
Total	56	31	210	1	44	14
Project Summer						
Area	54	<1	65	<1	<1	<1
Energy (Natural Gas)[c,d]	<1	3	3	<1	<1	<1

Table IV.B-7 (Continued)
Estimate of Maximum Regional Project Daily Operational Emissions (Proposed Development Program)—At Project Buildout (2028)

Emission Source	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile	47	30	347	<1	79	20
Emergency Generators	<1	10	4	<1	<1	<1
Charbroilers	3	<1	<1	<1	7	4
On-site Trucks	<1	2	14	<1	3	<1
Total	106	46	433	2	89	26
Project less Existing Summer						
Area	26	<1	32	<1	<1	<1
Energy (Natural Gas)[c,d]	<1	<1	<1	<1	<1	<1
Mobile	25	16	182	<1	41	11
Emergency Generators	<1	<1	2	<1	<1	<1
Charbroilers	<1	<1	<1	<1	2	1
On-site Trucks	<1	1	9	<1	1	<1
Total Proposed Uses Emissions	51	15	223	<1	45	12
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(4)**	**(40)**	**(327)**	**(150)**	**(105)**	**(43)**
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 D (CalEEMod Output) of this Draft EIR.*

[b] *Existing emissions are at Project buildout (2028), while existing emissions shown in Table IV.B-3 are for the baseline year of 2023.*

[c] *The Project would comply with the City's All-Electric Buildings Ordinance, as applicable, which does not allow for natural gas usage in new buildings with the exception of commercial kitchens, such as restaurant uses. It was assumed that existing buildings to remain would continue to consume natural gas.*

[d] *Energy source emissions are based on CalEEMod default energy rates and account for the All-Electric Buildings scenario in compliance with Ordinance No. 187,714. The Applicant is including Project Design Feature GHG-PDF-1, the implementation of which would result in a decrease in operational criteria pollutant emissions. Detailed calculations are provided in Appendix D of this Draft EIR.*

Source: Eyestone Environmental, 2025.

uses), provided that the maximum permitted floor area of 2,200,000 square feet is not exceeded, as described further below. For more information about the land use exchange component of the Specific Plan, see Section IV.J, Land Use and Planning, of this Draft EIR.

Table IV.B-8 on page IV.B-69 also provides the operational emissions for the development scenario under the land use exchange program that would generate the highest potential regional operational emissions, which involves increasing sound stage floor area by 125,000 square feet and decreasing the production support floor area by the same

Table IV.B-8
Estimate of Maximum Regional Project Daily Operational Emissions (Land Use Exchange Maximum Demand Scenario)—At Project Buildout (2028)[a]

Emission Source	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Winter[b]						
Area	29	<1	33	<1	<1	<1
Energy (Natural Gas)[c]	<1	5	5	<1	<1	<1
Mobile	22	16	155	<1	38	10
Emergency Generators	<1	10	2	<1	<1	<1
Charbroilers	3	<1	<1	<1	4	2
On-site Trucks	<1	<1	5	<1	1	<1
Total	55	32	200	1	44	14
Project Winter						
Area	54	<1	65	<1	<1	<1
Energy (Natural Gas)[c]	<1	3	3	<1	<1	<1
Mobile	47	33	329	<1	79	21
Emergency Generators	<1	10	4	<1	<1	<1
Charbroilers	3	<1	<1	<1	7	4
On-site Trucks	<1	3	14	<1	3	<1
Total	107	50	415	2	90	26
Project less Existing Winter						
Area	26	<1	32	<1	<1	<1
Energy (Natural Gas)[c]	(<1)	(<1)	(<1)	(<1)	(<1)	(<1)
Mobile	25	18	174	<1	42	11
Emergency Generators	<1	<1	2	<1	<1	<1
Charbroilers	<1	<1	<1	<1	2	1
On-site Trucks	<1	1	9	<1	1	<1
Total Proposed Uses Emissions	51	17	215	<1	46	12
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(4)**	**(38)**	**(335)**	**(150)**	**(104)**	**(43)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Existing Summer[b]						
Area	29	<1	33	<1	<1	<1
Energy (Natural Gas)[c]	<1	5	5	<1	<1	<1
Mobile	23	14	165	<1	38	10
Emergency Generators	<1	10	2	<1	<1	<1
Charbroilers	3	<1	<1	<1	4	2
On-site Trucks	<1	<1	5	<1	1	<1
Total	56	31	210	1	44	14
Project Summer						
Area	54	<1	65	<1	<1	<1
Energy (Natural Gas)[c]	<1	3	3	<1	<1	<1

Table IV.B-8 (Continued)
Estimate of Maximum Regional Project Daily Operational Emissions (Land Use Exchange Maximum Demand Scenario)—At Project Buildout (2028)

Emission Source	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile	48	30	351	<1	79	21
Emergency Generators	<1	10	4	<1	<1	<1
Charbroilers	3	<1	<1	<1	7	4
On-site Trucks	<1	3	14	<1	3	<1
Total	107	47	437	2	90	26
Project less Existing Summer						
Area	26	<1	32	<1	<1	<1
Energy (Natural Gas)[c,d]	(<1)	(<1)	(<1)	(<1)	(<1)	(<1)
Mobile	25	16	186	<1	42	11
Emergency Generators	<1	<1	2	<1	<1	<1
Charbroilers	<1	<1	<1	<1	2	1
On-site Trucks	<1	1	9	<1	1	<1
Total Proposed Uses Emissions	51	16	227	<1	46	12
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(4)**	**(39)**	**(323)**	**(150)**	**(104)**	**(43)**
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 D (CalEEMod Output) of this Draft EIR.*

[b] *Existing emissions are at Project buildout (2028), while existing emissions shown in Table IV.B-3 are for the baseline year of 2023.*

[c] *The Project would comply with the City's All-Electric Buildings Ordinance, as applicable, which does not allow for natural gas usage in new buildings with the exception of commercial kitchens such as restaurant uses. It was assumed that existing buildings to remain would continue to consume natural gas.*

[d] *Energy source emissions are based on CalEEMod default energy rates and account for the All-Electric Buildings scenario in compliance with Ordinance No. 187,714. The Applicant is including Project Design Feature GHG-PDF-1, the implementation of which would result in a decrease in operational criteria pollutant emissions. Detailed calculations are provided in Appendix D of this Draft EIR.*

Source: Eyestone Environmental, 2025.

amount. As shown in Table IV.B-8 on page IV.B-69, regional emissions from this development scenario would result in an increase in operational emissions but would not exceed SCAQMD's daily regional operational thresholds, and impacts would remain less than significant.

(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.B-10 on page IV.B-77 in the analysis further below, Project-related construction emissions would not exceed the SCAQMD-recommended LSTs for CO and NO_X. However, maximum construction emissions would exceed the SCAQMD-recommended LSTs for PM_{10} and $PM_{2.5}$ primarily as a result of demolition and excavation/grading activities. **Therefore, localized construction emissions associated with the Project would result in a potentially significant impact.**

(ii) Operation

Project-related operational emissions were also evaluated based on SCAQMD LST methodology from on-site sources (e.g., charbroilers, emergency generators). 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.[87]

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

As shown in Table IV.B-6 on page IV.B-66, Project construction emissions would exceed SCAQMD regional significance thresholds for NO_X. Localized Project construction emissions would exceed LSTs for PM_{10} and $PM_{2.5}$ as shown in Table IV.B-10 on page IV.B-77 further below. Thus, construction of the Project would have potentially significant impacts with regard to regional and localized emissions.

Project operational emissions shown in Table IV.B-7 and Table IV.B-8 on pages IV.B-67 and IV.B-69, respectively, would not exceed any of SCAQMD's regional thresholds. Operational emissions from the Project would not exceed any of SCAQMD's localized significance thresholds at Project buildout as shown in Table IV.B-11 and Table IV.B-12 on pages IV.B-81 and IV.B-83, respectively, further below. Thus, operation of the Project would have less-than-significant impacts with regard to regional and localized emissions.

With the exceedance of the regional threshold for NO_X and localized thresholds for PM_{10} and $PM_{2.5}$ during construction, **the Project would 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, resulting in potentially significant air quality impacts.**

(2) Mitigation Measures

The following mitigation measures set forth a program of air pollution control strategies designed to reduce the Project's potentially significant construction-related air quality impacts during construction.

Mitigation Measure AIR-MM-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 50 horsepower, that shall be used during any portion of construction. 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 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. In addition, where commercially reasonable for the Project Site, construction equipment shall meet Tier 5 requirements.

To the extent commercially reasonable for the Project Site, small electric (i.e., less than 19 kilowatts) off-road equipment shall be used during Project construction in lieu of conventional small gasoline or diesel off-road equipment. Electric pumps shall be used for temporary dewatering during Project construction.

Mitigation Measure AIR-MM-2: During excavation activities for the South Lot, CARB verified soil stabilizers shall be used on unpaved haul roads. Unpaved haul roads shall also be covered with gravel with a maximum of five percent silt content. The on-site speed limit for construction employee vehicles and delivery and haul trucks shall be limited to 15 miles per hour (mph) on paved surfaces, 10 mph on unpaved surfaces controlled by soil stabilizers, and 5 mph near active work zones to position for loading/unloading.

Mitigation Measure AIR-MM-3: Construction haul truck staging areas shall be located on-site, as shown in Appendix D of the Draft EIR. In addition, where commercially reasonable for the Project Site, the Project's truck operator(s)/construction contractor(s) shall use 2014 model year or newer heavy-duty trucks meeting CARB's 2013 optional low-NO_X standard (i.e., 0.02 grams per brake horsepower hour (g/bhp-hour) of NO_X emissions).

Mitigation Measure AIR-MM-4: All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

Air quality impacts related to Project operations would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

(a) Construction

Implementation of the mitigation measures described above would reduce construction emissions. Table IV.B-9 on page IV.B-74 provides the peak daily mitigated regional emissions by construction year. As presented in Table IV.B-9, with the implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4, peak daily regional NO_X emissions would be reduced but would still exceed the SCAQMD regional threshold of 100 pounds per day. **As such, Project construction would result in a potentially significant Project-level and cumulative-level impact related to regional NO_X emissions even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable.**

Table IV.B-9
Estimate of Maximum Regional Project Daily Construction (Mitigated) Emissions—39-Month Buildout (2028) (pounds per day)[a]

Construction Year	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Construction Emissions Winter						
2025	3	142	111	1	43	11
2026	34	137	191	1	43	11
2027[b]	35	54	204	0	36	8
2028[b]	34	50	203	0	36	8
Maximum Construction Emissions	35	142	204	1	43	11
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(40)**	**42**	**(346)**	**(149)**	**(107)**	**(44)**
Maximum Construction Emissions Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**
Regional Construction Emissions Summer						
2025[c]	0	0	0	0	0	0
2026	37	170	301	1	73	18
2027[b]	35	51	220	0	36	8
2028[b]	34	45	198	0	27	6
Maximum Construction Emissions	37	170	301	1	73	18
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(38)**	**70**	**(249)**	**(149)**	**(77)**	**(37)**
Maximum Construction Emissions Exceed Threshold?	**No**	**Yes**	**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 D (CalEEMod Output) of this Draft EIR.*

[b] *Emissions include off-site improvements.*

[c] *Construction years, which show zero emissions, indicate that no construction activities are occurring during the year and season (e.g., Summer 2025).*

Source: Eyestone Environmental, 2025.

Implementation of the mitigation measures described above would reduce localized construction emissions. Table IV.B-13 on page IV.B-88 further below provides the peak daily mitigated localized emissions by construction year. As presented therein, with the implementation of Mitigation Measure AIR-MM-1, which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards, and Mitigation Measure AIR-MM-2, which requires the use of soil stabilizers and gravel roads associated with demolition and grading/excavation activities, peak daily localized emissions would be reduced to below the SCAQMD LST thresholds. Mitigation Measures AIR-MM-3 and

AIR-MM-4 would also serve to reduce localized emissions from on-site trucks and equipment. **As such, Project construction would result in less-than-significant Project-level and cumulative-level impacts related to localized emissions with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4.**

(b) Operation

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

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

(1) Impact Analysis

(a) Construction

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

As discussed above in the methodology subsection, the localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[88] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2021–2023) for the Project area presented in Table IV.B-2 on page IV.B-27. Although the trend shown in Table IV.B-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., 2025–2028). 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 (2021–2023).

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 7 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 has been recommended by SCAQMD for a screening-level

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

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.[89] Potential impacts were evaluated at the closest off-site sensitive receptor, which are residential uses located west of the Project Site. In addition, the Project would include off-site improvements, such as the Radford Bridge, repaving of Radford Avenue, and improvements along Carpenter Avenue, discussed further in Section II, Project Description, of this Draft EIR. In order to account for residential uses adjacent to the off-site construction activities along Radford Avenue, sensitive receptors were assumed to be adjacent to the Project Site. In accordance with SCAQMD recommendations, the LST receptor distance was assumed to be 25 meters. Ambient air quality standards for NO_X and CO have averaging times of 1-hour and 8-hour, respectively.

As discussed above, the Project would have the option to be built out over a 20-year period. Under this construction scenario, portions of the Project Site would be built out sequentially over 20 years in separate, non-consecutive phases. As a result, the acreage of construction activities and distance to sensitive receptors would vary depending on the location of construction. In addition to analyzing localized impacts for the 39-month construction scenario, individual construction phases of the 20-year construction scenario were also included in the localized analysis.

The maximum daily localized emissions from Project construction and LSTs are presented in Table IV.B-10 on page IV.B-77, which identified that the maximum construction emissions would exceed the SCAQMD-recommended localized screening thresholds for PM_{10} and $PM_{2.5}$. **As a result, localized construction emissions resulting from the Project would result in a potentially significant impact.**

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

Consistent with the CO methodology discussed 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 approximately 3,400 passenger car equivalent (PCE) trips, which include employee, delivery, and haul truck trips during building construction.[90] The highest average daily trips at an intersection under the existing condition is approximately 70,000 trips at the Laurel Canyon Boulevard and Moorpark Street

[89] *A confirmatory analysis is included as Appendix D-8 (AERMOD Dispersion Modeling) of this Draft EIR which substantiates the results of the LST screening level analysis of localized impacts.*

[90] *Gibson Transportation Consulting Inc., Transportation Assessment for the Radford Studio Center Project, Studio City, California, July 2024, revised January 2025. Refer to Appendix O.1 of this Draft EIR.*

Table IV.B-10
Estimate of Maximum Localized Daily Project Construction Emissions—Unmitigated (pounds per day)[a,b]

Construction Year	NO_X	CO	PM_{10}	$PM_{2.5}$
39-Month Scenario				
Winter				
Year 2025	46	57	48	6
Year 2026	61	73	48	6
Year 2027	70	91	22	4
Year 2028	70	98	22	4
Maximum Daily Localized Emissions [e]	**70**	**98**	**48**	**6**
SCAQMD Localized Significance Thresholds[c]	**141**	**499**	**24**	**7**
Over/(Under)	**(71)**	**(401)**	**24**	**(1)**
Exceed Threshold?	**No**	**No**	**Yes**	**No**
Summer				
Year 2025[c]	0	0	0	**0**
Year 2026	95	117	65	**9**
Year 2027	70	91	22	**4**
Year 2028	70	98	16	**3**
Maximum Daily Localized Emissions	**95**	**117**	**65**	**9**
SCAQMD Localized Significance Thresholds[d]	**141**	**499**	**24**	**7**
Over/(Under)	**(46)**	**(382)**	**41**	**2**
Exceed Threshold?	**No**	**No**	**Yes**	**Yes**
20-Year Scenario—Phase 1 (2025–2027)				
Maximum Daily Localized Emissions[e]	62	85	3	2
SCAQMD Localized Significance Thresholds[d]	**103**	**499**	**10**	**3**
Over/(Under)	**(42)**	**(413)**	**(7)**	**(1)**
Exceed Threshold?	**No**	**No**	**No**	**No**
20-Year Scenario—Phase 2 (2030–2033)				
Maximum Daily Localized Emissions	40	67	18	3
SCAQMD Localized Significance Thresholds[d]	**245**	**698**	**50**	**15**
Over/(Under)	**(205)**	**(632)**	**(31)**	**(12)**
Exceed Threshold?	**No**	**No**	**No**	**No**
20-Year Scenario—Phase 3 (2038–2040)				
Maximum Daily Localized Emissions	62	115	32	4
SCAQMD Localized Significance Thresholds[d]	**143**	**898**	**30**	**10**
Over/(Under)	**(81)**	**(783)**	**2**	**(5)**
Exceed Threshold?	**No**	**No**	**Yes**	**No**
20-Year Scenario—Phase 4 (2044–2045)				
Maximum Daily Localized Emissions	31	51	13	2
SCAQMD Localized Significance Thresholds[d]	**156**	**1,446**	**50**	**16**

Table IV.B-10 (Continued)
Estimate of Maximum Localized Daily Project Construction Emissions—Unmitigated (pounds per day)

Construction Year	NO_X	CO	PM_{10}	$PM_{2.5}$
Over/(Under)	**(125)**	**(1,396)**	**(37)**	**(14)**
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 D (CalEEMod Output) of this Draft EIR.*

[b] *Unmitigated emissions assumes compliance with SCAQMD Rule 403, which is a requirement for construction projects within the South Coast Air Basin.*

[c] *Construction years, which show zero emissions, indicate that no construction activities are occurring during the year and season (e.g., Summer 2025).*

[d] *Potential localized construction impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 7 for a 5-acre site under the 39-month scenario. Localized thresholds for individual phases under the 20-year buildout scenario would vary depending on the acreage of construction and distance to sensitive receptors. Localized thresholds calculated for the 20-year buildout utilizes a linear interpolation between the 2-acre and 5-acre thresholds. These calculations are provided in Appendix D of this Draft EIR. The closest existing sensitive receptor are residential uses west of the Project Site. The localized threshold is based on a 25-meter receptor distance which is the closest receptor distance on the SCAQMD mass rate LST look-up table.*

[e] *Values represent maximum daily emissions throughout the duration of construction.*

Source: Eyestone Environmental, 2025.

intersection.[91] Conservatively assuming that all of the Project construction vehicles would drive through this intersection would result in approximately 73,400 trips, which is substantially 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.[92] This daily trip estimate is based on the peak hour conditions of the intersection. In addition, the Project proposes construction of the Radford Bridge, which is a new multi-modal bridge that would extend from the northern terminus of Radford Avenue north across the Tujunga Wash to Moorpark Street. Construction of the Radford Bridge would slightly alter the traffic patterns in the area, resulting in approximately 89,000 trips at the Laurel Canyon Boulevard and Moorpark Street intersection, which is still less than 400,000 vehicles per day. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Laurel Canyon Boulevard and Moorpark Street intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. The Project off-site construction activities, including the highest average daily trips, would not

[91] *Appendix D-2: CO Hotspot Analysis, of this Draft EIR.*

[92] *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.*

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. The Project would also require dewatering and treatment of potentially contaminated groundwater during construction. Elevated concentrations of trichloroethene (TCE) were detected in the groundwater located in the southwestern corner of the Project Site.[93] However, this contamination was limited to approximately 3,000 cubic yards of soil out of the approximately 935,000 cubic yards to be excavated. The Project proposes to treat contaminated groundwater by implementing a closed loop system with carbon filtration, which would limit potential TCE emissions.

Elevated levels of lead and arsenic were detected in soils to be excavated. Approximately 6,200 cubic yards of soil to be excavated contain elevated lead concentrations while 3,000 cubic yards of soil to be excavated contain elevated arsenic concentrations. Elevated petroleum hydrocarbons were also detected in up to 1,500 cubic yards of soil to be excavated. The Project would be required to comply with SCAQMD Rule 403 to limit fugitive dust and Rule 1166 to limit VOC emissions during excavation.

According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" 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 39 months (three 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. Under the 20-year buildout scenario, construction activities would be less intensive resulting in lower TAC concentrations at nearby sensitive receptors. In addition, construction activities under the 20-year buildout scenario would be occurring for short durations (1 to 2 years) for each phase. Under the 39-month buildout scenario, TAC concentrations would be more conservative in comparison to the 20-year buildout scenario. Therefore, it is 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

[93] *Geosyntec Consultants, Estimated Volume of Impacted Soil and Constituents of Potential Concern at Radford Studio Center, Studio City, California, November 2023.*

concentrations. Therefore, Project-related TAC impacts during construction would be less than significant.

(b) Operation

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

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table IV.B-11 on page IV.B-81 for the Project and Table IV.B-12 on page IV.B-83 for the maximum demand scenario under the proposed land use exchange program. The SCAQMD LST mass rate look-up tables were used to evaluate potential localized impacts. As shown in Table IV.B-11 and Table IV.B-12, on-site operational emissions would not exceed any of the LSTs. The Project's on-site operational activities, including generation of criteria pollutants, would not 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 discussed 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 83,000 trips at the Laurel Canyon Boulevard and Moorpark Street intersection, which is substantially 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.[94] There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Laurel Canyon Boulevard and Moorpark 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.[95] In 2003, the maximum 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2022.[96] Therefore, the Project does not trigger the need for a detailed CO hotspots model

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[94] *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.*

[95] *SCAQMD, Carbon MoNO$_x$ide Redesignation Request and Maintenance Plan, February 2005.*

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

Table IV.B-11
Estimate of Maximum Localized Project Daily Operational Emissions (Proposed Development Program)—At Project Buildout (2028) (pounds per day)[a]

Emission Source	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Existing Winter[b]				
Area	<1	33	<1	<1
Energy (Natural Gas)	5	5	<1	<1
Emergency Generator	10	2	<1	<1
Charbroilers	<1	<1	4	2
On-site Trucks	<1	5	1	<1
Total	17	45	7	4
Project Winter				
Area	<1	65	<1	<1
Energy (Natural Gas)[c,d]	3	3	<1	<1
Emergency Generator	10	4	<1	<1
Charbroilers	<1	<1	7	4
On-site Trucks	2	14	3	<1
Total	16	86	10	5
Project less Existing Winter				
Area	<1	32	<1	<1
Energy (Natural Gas)[c,d]	(2)	(2)	0	0
Emergency Generator	0	2	0	0
Charbroilers	0	0	2	1
On-site Trucks	1	9	1	0
On-Site Total	(1)	41	3.6	1.6
SCAQMD Significance Threshold[e,f]	144	1,434	4	2
Over/(Under)	**(145)**	**(1,393)**	**(0.4)**	**(0.4)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Existing Summer[b]				
Area	<1	33	<1	<1
Energy (Natural Gas)	5	5	<1	<1
Emergency Generator	10	2	<1	<1
Charbroilers	<1	<1	4	2
On-site Trucks	<1	5	1	<1
Total	17	45	7	4
Project Summer				
Area	<1	65	<1	<1
Energy (Natural Gas)[c,d]	3	3	<1	<1
Emergency Generator	10	4	<1	<1
Charbroilers	<1	<1	7	4
On-site Trucks	2	14	3	<1
Total	16	86	10	5

Table IV.B-11 (Continued)
Estimate of Maximum Localized Project Daily Operational Emissions (Proposed Development Program)—At Project Buildout (2028) (pounds per day)

Emission Source	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Project less Existing Summer				
Area	<1	32	<1	<1
Energy (Natural Gas)[c,d]	(2)	(2)	0	0
Emergency Generator	0	2	0	0
Charbroilers	0	0	2	1
On-site Trucks	1	9	1	0
On-Site Total	(1)	41	3.6	1.6
SCAQMD Significance Threshold[e,f]	144	1,434	4	2
Over/(Under)	**(145)**	**(1,393)**	**(0.4)**	**(0.4)**
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 D (CalEEMod Output) of this Draft EIR.*

[b] *Existing emissions are at Project buildout (2028), while existing emissions shown in Table IV.B-3 are for the baseline year of 2023.*

[c] *The Project would comply with the City's All-Electric Buildings Ordinance, as applicable, which does not allow for natural gas usage in new buildings with the exception of commercial kitchens, such as restaurant uses. It was assumed that existing buildings to remain would continue to consume natural gas.*

[d] *Energy source emissions are based on CalEEMod default energy rates and account for the All-Electric Buildings scenario in compliance with Ordinance No. 187,714. The Applicant is including Project Design Feature GHG-PDF-1, the implementation of which would result in a decrease in operational criteria pollutant emissions. Detailed calculations are provided in Appendix D of this Draft EIR.*

[e] *Potential localized construction impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 7 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.*

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

Source: Eyestone Environmental, 2025.

Table IV.B-12
Estimate of Maximum Localized Project Daily Operational Emissions (Land Use Exchange Maximum Demand Scenario)—At Project Buildout (2028) (pounds per day)[a]

Emission Source	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Existing Winter				
Area	<1	33	<1	<1
Energy (Natural Gas)	5	5	<1	<1
Emergency Generator	10	2	<1	<1
Charbroilers	<1	<1	4	2
On-site Trucks	<1	5	1	<1
Total	17	45	7	4
Project Winter				
Area	<1	65	<1	<1
Energy (Natural Gas)	3	3	<1	<1
Emergency Generator	10	4	<1	<1
Charbroilers	<1	<1	7	4
On-site Trucks	3	14	3	<1
Total	17	86	10	5
Project less Existing Winter				
Area	<1	32	<1	<1
Energy (Natural Gas)	(2)	(2)	0	0
Emergency Generator	0	2	0	0
Charbroilers	0	0	2	1
On-site Trucks	1	9	1	0
On-Site Total	0	41	3.6	1.6
SCAQMD Significance Threshold[b,c]	144	1,434	4	2
Over/(Under)	**(145)**	**(1,393)**	**(0.4)**	**(0.4)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Existing Summer				
Area	<1	33	<1	<1
Energy (Natural Gas)	5	5	<1	<1
Emergency Generator	10	2	<1	<1
Charbroilers	<1	<1	4	2
On-site Trucks	<1	5	1	<1
Total	17	45	7	4
Project Summer				
Area	<1	65	<1	<1
Energy (Natural Gas)	3	3	<1	<1
Emergency Generator	10	4	<1	<1
Charbroilers	<1	<1	7	4
On-site Trucks	3	14	3	<1
Total	17	86	10	5

Table IV.B-12 (Continued)
Estimate of Maximum Localized Project Daily Operational Emissions (Land Use Exchange Maximum Demand Scenario)—At Project Buildout (2028) (pounds per day)

Emission Source	Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Project less Existing Summer				
Area	<1	32	<1	<1
Energy (Natural Gas)	(2)	(2)	0	0
Emergency Generator	0	2	0	0
Charbroilers	0	0	2	1
On-site Trucks	1	9	1	0
On-Site Total	0	41	3.6	1.6
SCAQMD Significance Threshold[b,c]	144	1,434	4	2
Over/(Under)	**(145)**	**(1,393)**	**(0.4)**	**(0.4)**
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 D (CalEEMod Output) of this Draft EIR.*

[b] *Potential localized construction impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 7 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.*

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

Source: Eyestone Environmental, 2025.

and would not cause any new or exacerbate any existing CO hotspots. The supporting data for this analysis is included in Appendix D 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.

(iii) Toxic Air Contaminants

On-Site Sources

The primary sources of potential TACs 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., charbroilers, emergency generators). 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 CARB

recommends that HRAs be conducted for projects that result in 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 SCAQMD has provided guidance for analyzing mobile source diesel emissions.[97] However, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting an HRA since daily truck trips to the Project Site would not exceed 100 heavy duty trucks per day or more than 40 trucks with operating transport refrigeration units.[98] 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 DPM emissions. 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. The Project would include similar types of land uses as the existing site (studio uses) and would thus include similar types of TAC emission sources. The Project would not result in substantial new types of TAC emission sources that are not already generated on-site. 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 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 to access the Project 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,

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

[98] *On-Site operational truck deliveries and Gibson existing truck counts (Appendix D-5 of this Draft EIR).*

which may use charbroilers or other cooking equipment. Project restaurant cooking operations would comply with SCAQMD Rule 1138, which limits emissions from cooking operations.

The Project Site currently contains 16 emergency generators, of which 12 are powered by diesel. Of the 12 existing diesel generators, five of the older generators would be removed as part of the Project and replaced with four newer generators. The newer generators are estimated to be rated at 2,000 kw each and would be required to comply with SCAQMD Rule 1470, which requires PM emissions to be no more than 0.02 g/hp-hr. The Project would also be required to locate generators at least 100 meters from school uses or childcare uses consistent with Rule 1470. With the removal of the older diesel generators and the addition of fewer, cleaner, and less polluting generators, the Project would result in a net decrease in DPM emissions associated with emergency generators.

In addition, the Project would result in minimal emissions of TACs from the use of consumer products and landscape maintenance activities, among other things. As mentioned above, the Project would not include major sources of spray paint usage or any uses, such as manufacturing, which would emit TACs. 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 localized construction emissions would exceed the SCAQMD LSTs for PM_{10} and $PM_{2.5}$. On- and off-site localized operational emissions would not exceed the SCAQMD LSTs. Similarly, the Project's TAC emissions would not exceed SCAQMD thresholds. Therefore, the Project would expose sensitive receptors to substantial pollutant concentrations, and impacts would be potentially significant.

(2) Mitigation Measures

Mitigation Measures AIR-MM-1 and AIR-MM-2, detailed above, would be required to reduce potentially significant localized construction emissions of PM_{10} and $PM_{2.5}$ to reduce impacts to sensitive receptors. Localized operational emissions associated with the Project would result in a less-than-significant air quality impact, and no mitigation is required.

(3) Level of Significance After Mitigation

(a) Construction

Implementation of the mitigation measures described above would reduce construction emissions. Table IV.B-13 on page IV.B-88 provides the peak daily mitigated localized emissions by construction year. As presented in Table IV.B-13, with the implementation of Mitigation Measure AIR-MM-1, which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards, and Mitigation Measure AIR-MM-2, which requires the use of soil stabilizers and gravel haul roads, peak daily localized emissions would be reduced below the SCAQMD LST thresholds. Emissions would be further reduced with the inclusion of Mitigation Measures AIR-MM-3 through AIR-MM-4. **As such, Project construction would result in less-than-significant Project-level and cumulative localized impacts to sensitive receptors with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4.**

(b) Operation

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

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

As discussed in 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.**

Table IV.B-13
Estimate of Maximum Localized Daily Project Construction Emissions—Mitigated (pounds per day)[a, b]

Construction Year	NO_X	CO	PM_{10}	$PM_{2.5}$
39-Month Scenario				
Winter				
Year 2025	20	63	13	2
Year 2026	22	86	13	2
Year 2027	33	104	8	2
Year 2028	36	111	8	2
Maximum Mitigated Daily Localized Emissions	**36**	**111**	**13**	**2**
SCAQMD Localized Significance Thresholds[c]	**141**	**499**	**24**	**7**
Over/(Under)	**(105)**	**(388)**	**(12)**	**(6)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Summer				
Year 2025[c]	0	0	0	0
Year 2026	37	136	17	2
Year 2027	33	104	8	2
Year 2028	36	111	6	1
Maximum Mitigated Daily Localized Emissions	**37**	**136**	**17**	**2**
SCAQMD Localized Significance Thresholds[d]	**141**	**499**	**24**	**7**
Over/(Under)	**(104)**	**(363)**	**(8)**	**(5)**
Exceed Threshold?	**No**	**No**	**No**	**No**
20-year Scenario—Phase 1 (2025–2027)				
Maximum Mitigated Daily Localized Emissions[e]	18	101	1	1
SCAQMD Localized Significance Thresholds[d]	**103**	**499**	**10**	**3**
Over/(Under)	**(85)**	**(398)**	**(9)**	**(3)**
Exceed Threshold?	**No**	**No**	**No**	**No**
20-year Scenario—Phase 2 (2030–2033)				
Maximum Mitigated Daily Localized Emissions[e]	21	76	5	1
SCAQMD Localized Significance Thresholds[d]	**245**	**698**	**50**	**15**
Over/(Under)	**(224)**	**(622)**	**(45)**	**(14)**
Exceed Threshold?	**No**	**No**	**No**	**No**
20-year Scenario—Phase 3 (2038–2040)				
Maximum Mitigated Daily Localized Emissions[e]	30	141	8	1
SCAQMD Localized Significance Thresholds[d]	**143**	**898**	**30**	**10**
Over/(Under)	**(112)**	**(756)**	**(22)**	**(8)**
Exceed Threshold?	**No**	**No**	**No**	**No**
20-year Scenario—Phase 4 (2044–2045)				
Maximum Mitigated Daily Localized Emissions[e]	25	55	4	1
SCAQMD Localized Significance Thresholds[d]	**156**	**1,446**	**50**	**16**

Table IV.B-13 (Continued)
Estimate of Maximum Localized Daily Project Construction Emissions—Mitigated (pounds per day)

Construction Year	NO_X	CO	PM_{10}	$PM_{2.5}$
Over/(Under)	**(132)**	**(1,391)**	**(46)**	**(15)**
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 D (CalEEMod Output) of this Draft EIR.*

[b] *Unmitigated emissions assumes compliance with SCAQMD Rule 403, which is a requirement for construction projects within the South Coast Air Basin.*

[c] *Construction years which show zero emissions indicate that no construction activities are occurring during the year and season. (e.g., Summer 2025).*

[d] *Potential localized construction impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 7 for a 5-acre site under the 39-month scenario. Localized thresholds for individual phases under the 20-year buildout scenario would vary depending on the acreage of construction and distance to sensitive receptors. Localized thresholds calculated for the 20-year buildout utilizes a linear interpolation between the 2-acre and 5-acre thresholds. These calculations are provided in Appendix D of this Draft EIR. The closest existing sensitive receptor are residential uses west of the Project Site. The localized threshold is based on a 25-meter receptor distance which is the closest receptor distance on the SCAQMD mass rate LST look-up table.*

[e] *Values represent maximum daily emissions throughout the duration of construction.*

Source: Eyestone Environmental, 2025.

e. Project Impacts with Long-Term Buildout

(1) Impact Analysis

While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. The following discussion addresses potential impacts associated with a long-term buildout.

From a construction standpoint, the overall amount of demolition, excavation/export, and square footage of building construction would not change. Thus, the use and types of equipment required for construction would be similar to that associated with a 2028 buildout. However, a long-term buildout would benefit from future improvements in equipment efficiencies, including more stringent regulatory requirements, that would reduce future air emissions during Project construction. Specifically, as previously discussed, based on

SCAQMD factors, the construction equipment and truck fleet mix would emit less pollution in future years due to more stringent emissions control regulations. As construction air quality impacts are evaluated on a worst-case day, the shorter construction duration (2025–2028) would assume more intensive activities, as well as overlapping activities and construction phases, on a daily basis. Therefore, as a conservative assumption, it was assumed that construction would be completed by 2028.

From an operational standpoint, a long-term buildout would also result in an overall reduction in operational emissions due to more stringent requirements in the future. As an example, Title 24 requirements apply to projects based on the date when a building permit is issued. Thus, buildings constructed at a later date would be required to comply with subsequent versions of Title 24, which typically include increasingly stringent energy conservation requirements and associated reductions in energy use.[99] In addition, Governor Gavin Newsom signed Executive Order No. N-79-20 on September 23, 2020, which will phase out sales of new gas-powered passenger cars in California by 2035, with an additional 10-year transition period for heavy vehicles. With more stringent fuel economy requirements in subsequent years, fuel usage associated with the Project would similarly decrease. As such, a long-term buildout would reduce the Project's operational emissions.

Extending the full buildout year to approximately 2045 also has the potential to result in concurrent construction and operational activities. Analysis of these concurrent activities assumed that the entire Project Site, with the exception of the southwestern portion of the Project Site, which includes sound stages and office uses, would be built out and operational by 2028, while construction activities were assumed to occur at lesser intensity compared to maximum daily intensity as would occur during the shorter 39-month construction duration. As shown in Table IV.B-14 on page IV.B-91, regional NO_X and VOC emissions would exceed the SCAQMD regional operational significance threshold (55 pounds per day) and result in a significant air quality impact. As shown in Table IV.B-14, the maximum daily concurrent construction (unmitigated) and operational VOC emissions (59 pounds per day) would increase by approximately 21 pounds in comparison to the maximum daily construction (mitigated) regional emissions (38 pounds per day) presented in Table IV.B-9 on page IV.B-74. It should be noted that the maximum daily concurrent construction (unmitigated) and operational VOC emissions would not exceed the SCAQMD regional construction threshold (75 pounds per day). As shown in Table IV.B-14, while the maximum daily concurrent construction (unmitigated) and operational NO_X emissions (138 pounds per day) would exceed the operational SCAQMD regional significance threshold, NO_X emissions would remain less than the maximum mitigated daily construction NO_X emission (155 pounds per day), as presented in Table IV.B-9.

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[99] *For example, nonresidential buildings are projected to use approximately 30 percent less energy than 2016 standards due mainly to lighting upgrades.*

Table IV.B-14
Estimated Maximum Daily Regional Emissions from Project Concurrent Construction (Unmitigated) and Operations

Analysis Year	Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Year 2028 (Phases 1-3 Buildout and Phase 4 Construction of Proposed Development Program)						
Construction (2028–2030 Max Daily)	14	123	114	0	47	12
Operation (2028)	45	15	194	0	37	9
Max. Daily Concurrent Emissions[a]	**59**	**138**	**308**	**0**	**83**	**21**
SCAQMD Significance Threshold (Construction)	75	100	550	150	150	55
SCAQMD Significance Threshold (Operations)	55	55	550	150	150	55
Exceed Threshold?	**Yes**	**Yes**	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 D (CalEEMod Output) of this Draft EIR.*

Source: Eyestone Environmental, 2025.

(2) Mitigation Measures

The following mitigation measure sets forth an air emission control strategy designed to reduce the Project's potentially significant concurrent construction and operations related air quality impacts to the extent feasible.

Mitigation Measure AIR-MM-5: During Project operations, all landscaping equipment used on-site shall be electric powered.

In addition, Mitigation Measure AIR-MM-1 detailed above, which involves the use of USEPA Tier 4 emissions compliant construction equipment, would be required to reduce construction emissions of NO_X.

(3) Level of Significance After Mitigation

Implementation of the mitigation measures described above would reduce construction and operational emissions. As presented in Table IV.B-15 on page IV.B-92 and operational VOC emissions would not exceed the SCAQMD regional construction threshold (75 pounds per day). As shown in Table IV.B-14, while the maximum daily concurrent

Table IV.B-15
Estimated Maximum Daily Regional Emissions from Project Concurrent Construction (Mitigated) and Operations

Analysis Year	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Year 2028 (Phases 1-3 Buildout and Phase 4 Construction of Proposed Development Program)						
Construction (2028–2030 Max Daily)	12	104	122	0	36	10
Operation (2028)	40	15	194	0	37	9
Max. Daily Concurrent Emissions[a]	52	119	316	0	73	19
SCAQMD Significance Threshold (Construction)	75	100	550	150	150	55
SCAQMD Significance Threshold (Operations)	55	55	550	150	150	55
Exceed Threshold?	**No**	**Yes**	**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 D (CalEEMod Output) of this Draft EIR.*

Source: Eyestone Environmental, 2025.

construction (unmitigated) and operational NO_X emissions (138 pounds per day) would exceed the operational SCAQMD regional significance threshold, NO_X emissions would remain less than the maximum mitigated daily construction NO_X emission (155 pounds per day), as presented in Table IV.B-9 on page IV.B-74, with the implementation of Mitigation Measure AIR-MM-1, which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards, and Mitigation Measure AIR-MM-5, which requires the use of all-electric landscaping equipment, peak daily emissions would be reduced below the SCAQMD thresholds for VOC. However, NO_X emissions resulting from concurrent construction and operational activities would continue to exceed both construction and operational SCAQMD significance thresholds. **As such, Project construction would result in a potentially significant Project-level and cumulative impact related to regional NO_X emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable.**

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 VI, 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 or result in other emissions, such as those leading to objectionable

odors, that may impact a substantial number of people. **Thus, the Project would have a less-than-significant impact with respect to Threshold (d). No further analysis of this issue is required.**

f. 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.[100] Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

(a) Construction

With respect to the Project's construction-period air quality emissions and cumulative Air Basin-wide conditions, the SCAQMD has developed strategies (e.g., SCAQMD Rule 403) to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal CAA mandates. As such, the Project would comply with regulatory requirements, including SCAQMD Rule 403 requirements, as discussed above. In addition, the Project would comply with adopted AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, all construction projects Air Basin-wide would comply with these same requirements (i.e., SCAQMD Rule 403 compliance) and would also implement feasible mitigation measures when significant impacts are identified

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As presented in Table IV.B-6 on page IV.B-66, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) without mitigation would exceed the SCAQMD daily significance thresholds for NO_X during Years 2025 and 2026 primarily as a result of grading and hauling activities overlapping with building construction activities. With incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4, maximum regional NO_X emissions would be substantially reduced by approximately 25 percent. Nevertheless, the Project would still exceed the

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

SCAQMD daily thresholds and consequently have a significant cumulative impact due to construction-related regional NO_X emissions.

In terms of localized air quality impacts, Table IV.B-10 on page IV.B-77 shows that maximum construction emissions without mitigation would exceed the SCAQMD-recommended localized screening threshold for PM_{10} and $PM_{2.5}$ in Years 2025 and 2026 primarily as a result of grading and hauling activities. With incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4, maximum localized construction emissions for off-site sensitive receptors would not exceed any of the SCAQMD-recommended localized screening thresholds.

As discussed above, the Project would result in a less-than-significant TAC emissions impact primarily because the duration of construction would be relatively short-term (39-months) in comparison to a long-term (70-year) exposure duration typically used to assess exposure to TACs. Construction activities under the 20-year buildout scenario would be occurring for short durations (1 to 2 years) for each phase. Under the 39-month buildout scenario, TAC concentrations would be more conservative in comparison to the 20-year buildout scenario. In addition, Mitigation Measure AIR-MM-1 requires the use of off-road diesel-powered construction equipment greater than 50 hp to meet the Tier 4 emission standards. Relative to previous emissions standards, Tier 4-compliant engines reduce emissions over 95 percent for most construction equipment.[101] As such, the Project's contribution to cumulative TAC emission impacts during construction would not be cumulatively considerable and, thus, would be less than significant.

(b) Operation

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

With respect to TAC emissions, neither the Project nor any of the related projects, would represent a substantial source of TAC emissions, which are more typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related

[101] *USEPA, Emission Standards Reference Guide, EPA Emission Standards for Nonroad Engines and Vehicles, www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles, accessed January 2, 2025.*

projects would not result in a cumulative impact requiring further evaluation. However, the Project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs CARB to identify substances as TACs and adopt ATCMs to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Air Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the Project would not result in any substantial sources of TACs that have been identified in CARB's Land Use Guidelines and, thus, cumulative 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.

(c) Concurrent Construction and Operation Emissions During Long-Term Buildout

Portions of the Project Site would be completed and occupied while construction of the later Project components would be ongoing. Therefore, concurrent construction and operational impacts were evaluated. As shown in Table IV.B-15 on page IV.B-92, concurrent emissions from the Project during operation and construction would exceed SCAQMD's regional NO_X and VOC significance thresholds. According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.

(2) Mitigation Measures

Mitigation Measures AIR-MM-1 through AIR-MM-4 would be implemented to reduce the Project's contributions to regional NO_X emissions and localized PM_{10} and $PM_{2.5}$ to the furthest extent feasible. As the Project's construction-related TAC emissions would not be cumulatively considerable, no mitigation measures are required.

Implementation of Mitigation Measure AIR-MM-5, which requires the use of all-electric landscaping equipment, would reduce VOC emissions during concurrent construction and operational activities.

(3) Level of Significance After Mitigation

As shown in Table IV.B-9 on page IV.B-74, despite implementation of Mitigation Measure AIR-MM-1, Project construction would result in a significant and unavoidable Project-level and cumulative regional air quality impact related to NO_X.

As shown in Table IV.B-13 on page IV.B-88, the Project's construction-related localized PM_{10} and $PM_{2.5}$ emissions would be reduced to less-than-significant levels with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4. Therefore, cumulative construction-related localized impacts would likewise be less than significant with mitigation. With regard to cumulative TAC emissions during construction, no mitigation measures were required or included, and the impact level remains less than significant.

As shown in Table IV.B-7 and Table IV.B-11 on pages IV.B-67 and IV.B-81, respectively, the Project's operational impacts were determined to be less than significant without mitigation and, thus, cumulative operational impacts would be less than significant without mitigation. Cumulative impacts related to operational TAC emissions also would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

As shown in Table IV.B-15 on page IV.B-92, with the implementation of Mitigation Measures AIR-MM-1 through AIR-MM-5, the Project's emissions during possible concurrent construction and operations would reduce potential impacts associated VOC emissions to a less than significant level, However, Project-level and cumulative regional air quality impacts related to NO_X would be significant and unavoidable. It should be noted that this impact would be temporary, and regional NO_X emissions would exceed the thresholds only during concurrent Project construction and operations.

g. Quantitative Analysis Connecting the Project's Significant Regional Pollutant Emissions and Human Health Is Not Meaningful

On December 24, 2018, the California Supreme Court issued its decision regarding *Sierra Club v. County of Fresno* (*Friant Ranch*). The California Supreme Court opinion in Friant Ranch requires projects with significant air quality impacts to "relate the expected adverse air quality impacts to likely health consequences or explain why it is not feasible at the time of drafting to provide such an analysis, so that the public may make informed decisions regarding the costs and benefits of the project."[102] The Friant Ranch decision also

[102] *Fifth Appellate District, Fresno County Superior Court,* Sierra Club v. County of Fresno Opinion*, December 2018.*

states that providing "only a general description of symptoms that are associated with exposure" … "fail[s] to indicate the concentrations at which such pollutants would trigger the identified symptoms …. " and "the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin." In light of Friant Ranch, this section discusses significant air quality impacts identified in City EIRs and the feasibility of directly relating any identified significant adverse air quality impact to likely health consequences.

In response to the California Supreme Court decision, the City prepared the Air Quality and Health Effects guidance document (Guidance Document) that addresses the potential for identifiable health impacts to result from air pollutants analyzed in City environmental documents prepared pursuant to CEQA.[103] The Guidance Document was prepared with the assistance of nine environmental consulting firms. This Guidance Document reviews air quality models, reviews how health effects are addressed in plans and regulatory standards, reviews the health effects of criteria pollutants and TACs, and discusses the ability to relate adverse air quality impacts and health effects. The Guidance Document explains that direct correlation of an individual project's emissions and anticipated health effects is not feasible, as no expert agency has approved a quantitative method to reliably and meaningfully translate mass emission estimates of criteria pollutants to specific health effects for the scale of projects typically analyzed in City EIRs. As discussed in the City's Guidance Document, Health Impact Assessments (HIAs) for individual projects would not provide meaningful results due to the scope and geographic areas over which health impacts are typically assessed. There are limitations associated with use of a regional-scale model for an individual project, including low resolution and spatial averaging that create uncertainty and the need for the model to accurately predict meteorology and topography. In particular, accurately depicting the concentration of O_3 (of which NO_X is a precursor) at or near a project site is made difficult since most of the criteria pollutant emissions come from area-wide sources or mobile sources driving to, from and around a project site. Running the regional-scale photochemical grid model used for predicting O_3 attainment with the emissions from the Project (which equates to approximately 0.013 percent of NO_X emissions in the air basin) would not yield reliable information regarding a measurable increase in O_3 concentrations sufficient to accurately quantify the Project's O_3-related health impacts. In addition, any modeled increase in O_3 concentrations would not be useful for meaningful analysis, as the

[103] *City of Los Angeles, Air Quality Health Effects (*Sierra Club v. County of Fresno*), October 2019, https://planning.lacity.gov/odocument/e1a00fbf-6134-4fa9-b6fd-54eee631effb/City_of_LA_-_Air_Quality_and_Health_Effects_and_Attachments.pdf, accessed January 16, 2025.*

increase would be so comparatively small that it would be well within the error margins of such models.[104]

The Guidance Document reviews available air quality models and identifies their general purposes, as well as limitations in quantifying emissions and health effects. As summarized therein, although there are certain models available (e.g., models to quantify emissions, dispersion models to determine pollutant concentrations, and regional-scale models which estimate health impacts), these models are limited by a number of factors in determining health impacts of individual development and infrastructure projects, as well as local plan-level projects. Specifically, in addition to the unsuitability of regional models in providing reliable results for individual projects, other general limitations of the currently available models include limitations on the ability of certain tools to model concentrations or the dispersion of pollutants for all types of sources, other models only addressing a partial and incomplete range of pollutants and secondary pollutants, and limitations on being able to correlate identified concentrations to related health effects. In particular, as discussed in the Guidance Document, air quality impacts for individual projects are based on emissions for criteria pollutants while health effects are based on concentrations that consider factors such as meteorology, the presence of sunlight, geographical distribution of emissions, and other complex photochemical factors. Nonetheless, the City's Guidance Document acknowledges that air quality modeling and research on health effects advances over time and that the City will continue to seek the latest guidance from local air quality agencies and experts and refine its approach based on future information as it becomes available.

The Association of Environmental Professionals (AEP) has also highlighted similar limitations and associated uncertainties with the use of large-scale regional models to estimate health effects. The AEP has concluded that, "Given the margin of uncertainty at each step in the process (regional scale modeling, existing ambient air quality effects on health, population health conditions vulnerability, and marginal health effects of air pollution), the identification of marginal health effects due to individual projects using regional air quality modelling and tools such as BENMAP are likely to be within the level of uncertainty and thus defined as 'speculative' per CEQA."

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[104] *In connection with the judicial proceedings culminating in issuance of the Friant Ranch decision, the San Joaquin Valley Air Pollution Control District (SJVAPCD) and the SCAQMD filed amicus briefs attesting to the extreme difficulty of correlating an individual project's criteria air pollutant emissions to specific health impacts. Both the SJVAPCD and the SCAQMD have among the most sophisticated air quality modeling and health impact evaluation capabilities of the air districts in the State. While the information and arguments presented in those briefs was considered by the California Supreme Court, the Court noted that such information was not part of the administrative record associated with the County's decision to approve the Friant Ranch project. Accordingly, a summary of the key, relevant points of the SJVAPCD and SCAQMD briefs is provided in the City's Guidance Document, which is also incorporated into the Draft EIR by reference.*

The USEPA has developed the Co-Benefits Risk Assessment Health Impacts Screening and Mapping Tool (COBRA Screening Tool) as a screening tool for state, local, and tribal government staff and others interested in the effects of air pollution to estimate the air quality and health benefits of different emissions scenarios. In 2024, the COBRA Screening Tool recently became available with a user-friendly interface. This tool estimates health effects associated with changes in emissions over large areas such as a County or Air Basin. Based on USEPA data, use of the COBRA Screening Tool has been primarily associated with the evaluation of large-scale programs, policies, or large areas of potential effect such as statewide efforts.

Nonetheless, for informational purposes, Appendix D of this Draft EIR includes a screening level review of Project-related health effects to residents within Los Angeles County associated with the Project's regional NO_X emissions that were determined by the analysis above to be above the significance threshold during overlap of Project construction and operation. However, neither the City nor the SCAQMD has promulgated use of this or any other model to estimate health effects from a development project. Therefore, the analysis is provided for informational purposes only.

Within the COBRA Screening Tool, the location of the Project must be selected to represent baseline population and ambient pollutant concentrations. The smallest unit of location (geographic scope) within the COBRA Screening Tool would be on a county level. This is a similar limitation as the models discussed above. For the assessment, Los Angeles County was selected to represent the Project area in terms of population exposure and existing emissions.

As shown in Appendix D, using the COBRA Screening Tool, the estimated health effects attributed to Project construction included mortality (0.05 incidences per year) and respiratory-related emergency room visits (0.12 incidences per year). The other health endpoints included asthma-related hospital admissions, all cardiovascular-related hospital admissions (not including myocardial infarctions), and nonfatal acute myocardial infarction, which ranged from 0.001 to 0.013 incidences per year. Health effects attributed to concurrent construction and operation of the Project ranged from 0.001 to 0.008 incidents per year.[105] Also note that for all the health endpoints (mortality, asthma, heart attacks, etc.), the total number of estimated health incidences resulting from Project construction is less than 0.0006 percent of the background health incidence within Los Angeles County.

[105] *Mortality values are based on a 20-year exposure duration, while non-mortality parameters (heart attack, respiratory, hospital admissions) are based on annual exposure. Therefore, the mortality incidence values presented are conservative, as the duration of construction activities is anticipated to be approximately 39 months.*

In summary, the analyses in this section above demonstrate that impacts associated with localized emissions and TACs would be less than significant. While there are state-wide and regional models that can be used to evaluate health risk from regional emissions from a project, there are complexities and limitations associated with using these large-scale models to correlate criteria air pollutant emissions from an individual project to specific health effects. In particular, the methods available to quantitatively evaluate health effects are not appropriate given the comparatively small increases that are within the margins of error of such large-scale models. Nonetheless, USEPA's COBRA Screening Tool was utilized to estimate the health effects associated with the Project's regional NO_X emissions and based on the screening tool, the health impacts of the Project would be negligible and less than significant. The City and SCAQMD have not yet established a methodology for evaluating health impacts from the significant regional emissions associated with a development project. As such, the results provided herein using the COBRA Screening Tool are not meaningful.