IV. Environmental Impact Analysis

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A. Air Quality

1. Introduction

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Project and evaluates whether Project emissions would conflict with or obstruct implementation of the applicable air quality plans; 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 *Technical Appendix for Air Quality and Greenhouse Gas Emissions*, provided in Appendix B of this Draft EIR.

2. Environmental Setting

a. Air Quality Background

(1) Air Quality and Public Health

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

[1] *USEPA, NAAQS Table, www.epa.gov/criteria-air-pollutants/naaqs-table, accessed April 9, 2024.*

judgment of the U.S. Environmental Protection Agency (USEPA), are necessary to protect public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to the NAAQS.[2] The NAAQS and CAAQS are listed in Table IV.A-1 on page IV.A-3.

At the regional level, the South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange, Riverside, and San Bernardino Counties, including the Coachella Valley.[3] The City of Los Angeles (City) is located within the South Coast Air Basin (Air Basin), which is a distinct geographic subarea within SCAQMD's jurisdiction. 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 Air Quality Management Plan (2022 AQMP), Appendix I, Health Effects, p. I-154.*

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

Table IV.A-1
Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
Ozone (O_3)	1 hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8 hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM_{10})	24 hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter ($PM_{2.5}$)	24 hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	9 µg/m^3	12 µg/m^3		
Carbon Monoxide (CO)	1 hour	35 ppm (40 mg/m^3)	20 ppm (23 mg/m^3)	Attainment	Attainment
	8 hour	9 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	1 hour	0.10 ppm (188 µg/m^3)	0.18 ppm (339 µg/m^3)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)		
Sulfur Dioxide (SO_2)	1 hour	0.075 ppm (196 µg/m^3)	0.25 ppm (655 µg/m^3)	Unclassified/ Attainment	Attainment
	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

— = no federal or State standard

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

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

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.					
[b] *Ambient Air Quality Standards based on the 2022 AQMP.*					
[c] *"Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.*					
[d] *California and Federal standard attainment status based on SCAQMD's 2022 AQMP.*					
[e] *An attainment re-designation request is pending.*					
Source: Compiled by the City of Los Angeles, 2024 based upon the 2022 AQMP.					

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

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

Air pollutant emissions within the Air Basin are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural

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

(3) Air Pollutant Types

(a) Criteria Pollutants

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

(i) Ozone (O_3)

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

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

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

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

(iii) Carbon Monoxide (CO)

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

(iv) Nitrogen Dioxide (NO_2)

NO_2 is a 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 from exposure to high levels of vinyl chloride in the air

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[4] *CARB, Hydrogen Sulfide & Health, 2019, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed April 9, 2024.*

[5] *CARB, Hydrogen Sulfide & Health, 2019, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed April 9, 2024.*

[6] *CARB, Hydrogen Sulfide & Health, 2019, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed April 9, 2024.*

[7] *CARB, Visibility-Reducing Particles and Health, ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed April 9, 2024.*

[8] *CARB, Visibility-Reducing Particles and Health, ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed April 9, 2024.*

[9] *CARB, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed April 9, 2024.*

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

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

Although 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, 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

[10] *CARB, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed April 9, 2024.*

[11] *CARB, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed April 9, 2024.*

include heavy duty diesel-fueled delivery trucks and stationary emergency generators. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

b. Regulatory Framework

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

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

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

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

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

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

[13] *USEPA Summary of the Clean Air Act, https://www.epa.gov/laws-regulations/summary-clean-air-act, accessed April 9, 2024.*

[14] *USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, last updated April 28, 2025, www.epa.gov/clean-air-act-overview/clean-air-act-text, accessed October 28, 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.A-1 on page IV.A-3 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State. As shown in Table IV.A-1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet State standards for O_3, PM_{10}, and $PM_{2.5}$ and, therefore, is considered a State "non-attainment" area for these pollutants.

(b) California Code of Regulations

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

(c) State Programs for Toxic Air Contaminants

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

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

(d) State Diesel Risk Reduction Program

CARB identified particulate emissions from diesel-fueled engines as TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which constituted 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

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 SCAQMD's jurisdiction as it 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, SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The 2022 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O_3 and $PM_{2.5}$ are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions[15] sufficiently to

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

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]

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. SCAQMD combines its portion of the AQMP with those prepared by SCAG.[19] The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on the 2020–2045 RTP/SCS.

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

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

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

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

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

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

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

While the 2024–2050 RTP/SCS has been adopted by SCAG, the 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

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

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

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

provided supplemental guidance on the SCAQMD website to be used in conjunction with the Handbook.[22]

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). SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

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] 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 SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

(c) SCAQMD Rules and Regulations

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

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

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[22] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#, accessed April 9, 2024.*

[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 PM2.5 Significance Thresholds, 2006.*

- **Rule 401—Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than 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, SCAQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

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

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

(4) Local

(a) City of Los Angeles General Plan

(i) Air Quality Element

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

decisions. In general, the City's General Plan (including the Framework Element, Air Quality Element, Mobility Plan 2035, and Health and Wellness Element) and L.A.'s Green New Deal contain policies and programs for the protection of the environment and health through improved air quality. These serve to provide additional critical guidance for the betterment of public health for the region and the City.

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

c. Existing Conditions

(1) Regional Air Quality

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

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

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, SCAQMD has adopted a series of AQMPs. The 2022 AQMP includes strategies to ensure that rapidly approaching attainment deadlines are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions[26] sufficiently to meet the upcoming O_3 standard deadlines. The 2022 AQMP provides a baseline year 2018 inventory of 351 tons per day (tpd) of NO_X and modeling results show that NO_X emissions are projected to be 184 tpd in the 8-hour O_3 attainment year of 2037, due to continued implementation of already adopted regulatory actions ("baseline emissions"). The 2022 AQMP suggests that total Air Basin emissions of NO_X must be reduced to 60 tpd in 2037 to attain the 8-hour O_3 standard. Although the existing air regulations and programs will continue to lower NO_X emissions in the region, an additional 67 percent of reductions from the baseline year of 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, SCAG has the responsibility of preparing and approving the portions of the AQMP. SCAQMD combines its portion of the AQMP with those prepared by SCAG. The RTP/SCS and Transportation Control Measures (TCMs), included as Appendix IV-C of the 2022 AQMP for the Air Basin, are based on SCAG's 2020–2045 RTP/SCS. The 2022 AQMP forecasts the 2037 emissions inventories ''with growth'' based on SCAG's 2020–2045 RTP/SCS. The region is projected to see a 12-percent growth in population, 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 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

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

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

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

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

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

SCAQMD has released the Multiple Air Toxics Exposure Study (MATES-V).[31] The MATES-V Study was aimed at estimating the cancer risk from toxic air emissions throughout the Air Basin by conducting a comprehensive monitoring program, an updated emissions inventory of TACs, and a modeling effort to fully characterize health risks for those living in the Air Basin. The MATES-V Study concluded that the average carcinogenic risk from air pollution in the Air Basin is approximately 424 in one million over a 70-year duration. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 50 percent of the risk is attributed to DPM 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, 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.

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30 *SCAQMD, Final 2022 AQMP, 2022, p. 1-9.*

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/page/Main-Page/?views=Click-tabs-for-other-data%2CGridded-Cancer-Risk, accessed April 9, 2024.*

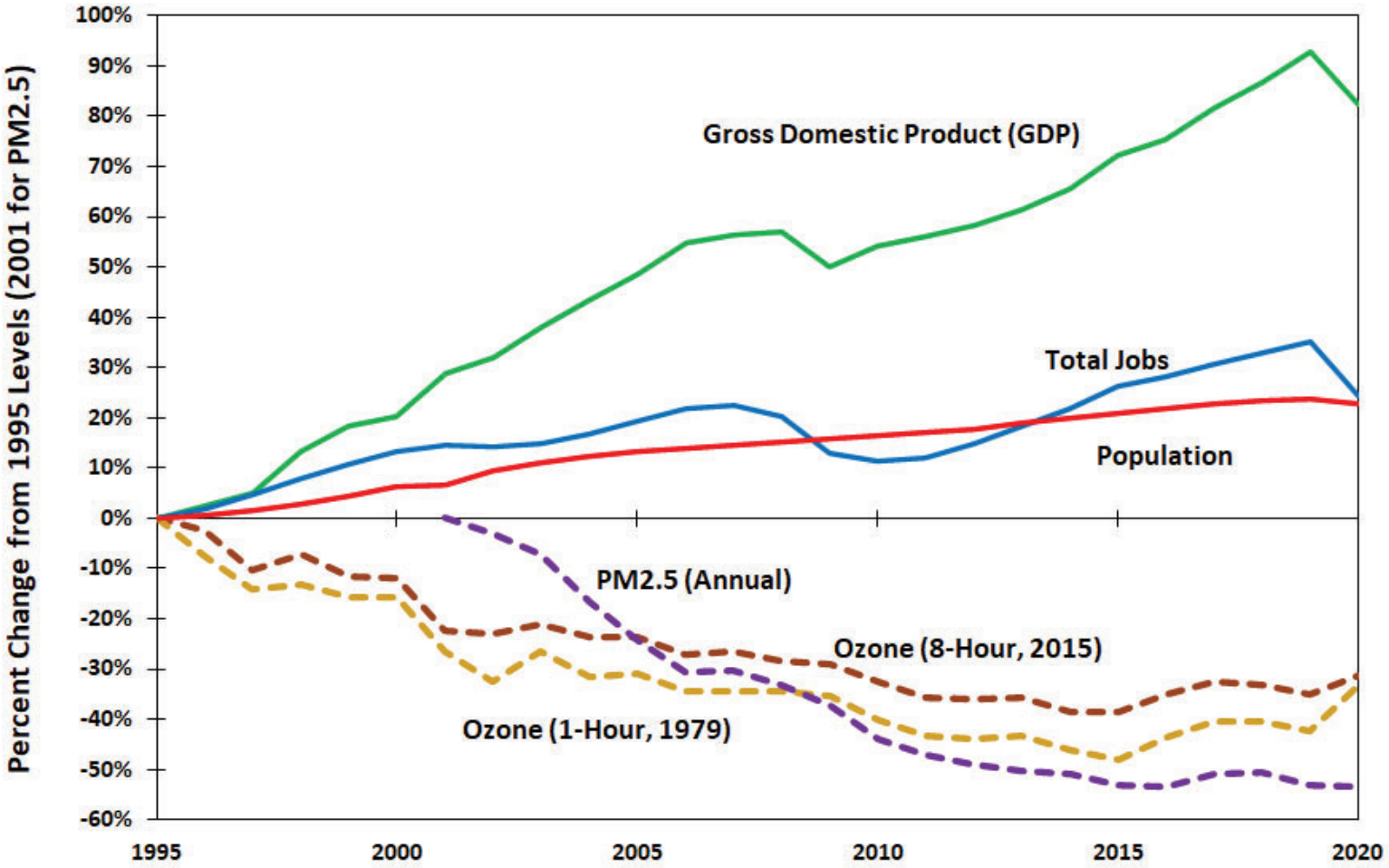

Figure IV.A-1
Ozone Trends

Source: AQMP, 2022.

Generally, the risk from TACs is lower near the coastline and higher risks are concentrated near large diesel sources (e.g., freeways, airports, and ports).

(2) Local Air Quality

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

(a) Existing Pollutant Levels at Nearby Monitoring Stations

SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin and has divided the Air Basin into 38 source receptor areas (SRAs) in which 31 monitoring stations operate. Figure IV.A-2 on page IV.A-25 shows the locations of the SRAs located in Los Angeles County. The Project Site is located within SRA 1, which covers the Central Los Angeles area. The monitoring station most representative of the Project Site is the North Main Street Station, located at 1630 North Main Street in the City of Los Angeles, approximately 0.5 miles northeast of the Project Site. Criteria pollutants monitored at this station include PM_{10}, $PM_{2.5}$, O_3, CO, NO_2, Pb, and SO_4^{2-}. Table IV.A-2 on page IV.A-26 identifies the NAAQS and CAAQS for relevant air pollutants along with the ambient pollutant concentrations that have been measured at this station through the period of 2022–2024.

(b) Existing Health Risk in the Surrounding Area

As shown in Figure IV.A-3 on page IV.A-28, based on the MATES-V model, the calculated cancer risk in the Project area is approximately 771 in one million.[34] The cancer risk in this area is predominately related to nearby sources of DPM (e.g., US-101). In general, the risk at the Project Site is comparable with other urbanized areas in Los Angeles, which have a similar calculated cancer risk as the Project area.

Potential sources of TACs within the Project Site vicinity were identified using SCAQMD's Facility Information Database (FIND) search and site reconnaissance to identify potential non-permitted TAC-emitting sources (e.g., freeways, diesel trucks idling at warehouse distribution facilities in excess of 100 trucks per day).[35] Based on the FIND search conducted, no major sources of TACs are located within a 0.25-mile radius of the

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[34] *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/page/Main-Page/?views=Click-tabs-for-other-data%2CGridded-Cancer-Risk, accessed April 9, 2024.*

[35] *SCAQMD, Facility Information Detail (F.I.N.D.), www.aqmd.gov/nav/FIND, accessed July 17, 2024.*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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

Air Quality Reporting

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

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

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

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

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

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

General Forecast Areas & Air Monitoring Areas

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

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

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

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

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

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

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

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

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

San Gabriel Mountains 15

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

Big Bear Lake 38

Banning Pass Area 29

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

ANTELOPE VALLEY APCD* 14

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

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

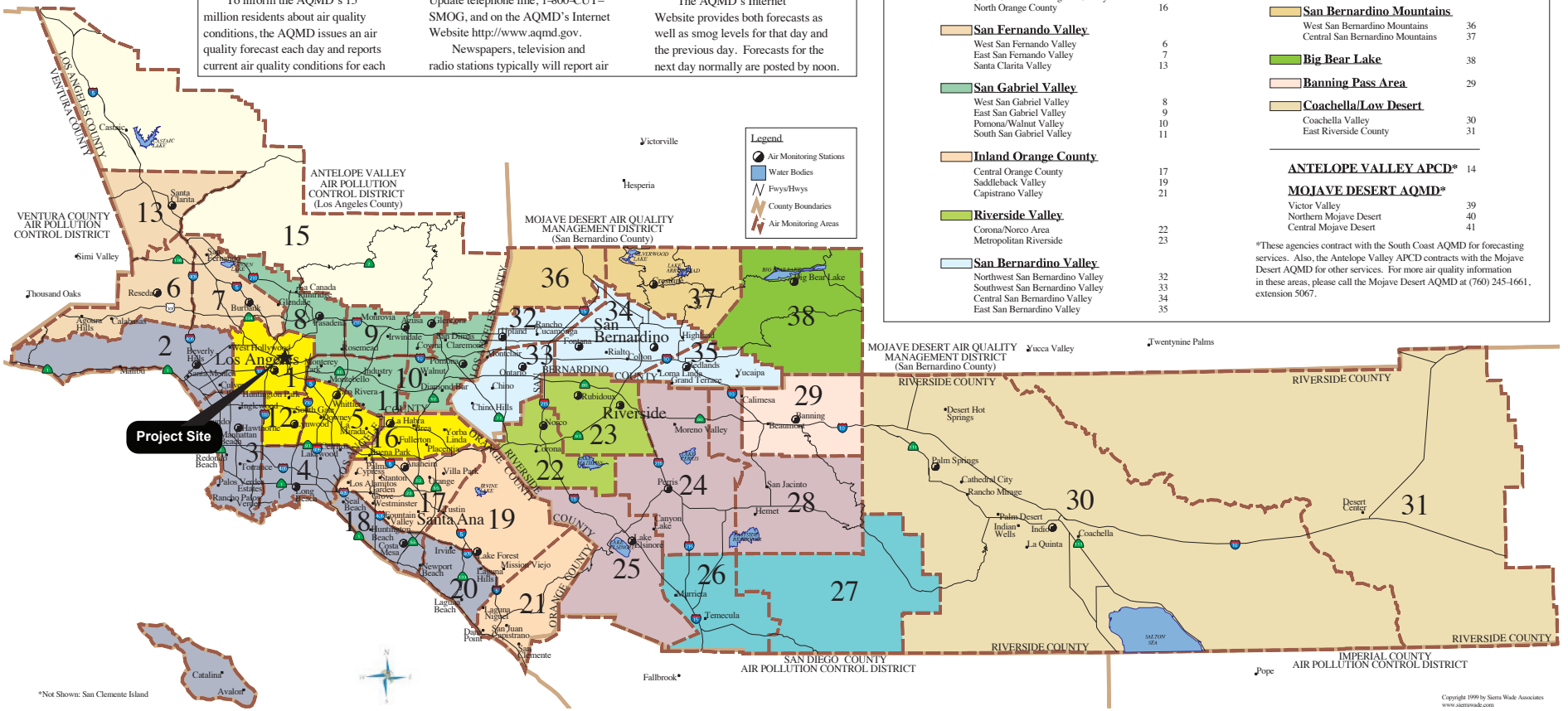

Figure IV.A-2
SCAQMD SRAs

Source: Sierra Wade Associates, 1999.

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

Pollutant	Year		
	2022	2023	2024
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.14	0.10	0.110
Days exceeding CAAQS (0.09 ppm)	1	1	2
Maximum 8-hour Concentration (ppm)	0.090	0.082	0.081
Days exceeding NAAQS (0.070 ppm)	6	7	6
Days exceeding CAAQS (0.070 ppm)	6	7	6
Respirable Particulate Matter (PM_{10})			
Maximum 24-hour Concentration (µg/m^3)	60	57	77
Days exceeding NAAQS (150 µg/m^3)	0	0	0
Days exceeding CAAQS (50 µg/m^3)	4	2	10
Annual Arithmetic Mean (µg/m^3)	29	24	25
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)	34	31	55
Days exceeding NAAQS (35 µg/m^3)	0	0	5
Annual Arithmetic Mean (µg/m^3)	11	10	12
Does measured AAM exceed NAAQS (12 µg/m^3)?	No	No	**Yes**
Does measured AAM exceed CAAQS (12 µg/m^3)?	No	No	**Yes**
Carbon Monoxide (CO)			
Maximum 1-hour Concentration (ppm)	1.7	1.4	1.8
Days exceeding NAAQS (35.0 ppm)	0	0	0
Days exceeding CAAQS (20.0 ppm)	0	0	0
Maximum 8-hour Concentration (ppm)	1.5	1.2	1.6
Days exceeding NAAQS and CAAQS (9.0 ppm)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.08	0.06	0.08
Days exceeding CAAQS (0.18 ppm)	0	0	0
Annual Arithmetic Mean (ppm)	0.0185	0.0162	0.0172
Does measured AAM exceed NAAQS (0.053 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
Sulfur Dioxide (SO_2)			
Maximum 1-hour Concentration (ppm)	0.007	0.008	0.002
Days exceeding NAAQS (0.075 ppm)	0	0	0
Maximum 24-hour concentration (ppm)	N/A	N/A	N/A
Days exceeding CAAQS (0.04 ppm)	0	0	0
Days exceeding NAAQS (0.14 ppm)	0	0	0

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

Pollutant	Year		
	2022	2023	2024
Lead (Pb)[a]			
Maximum 30-day Average Concentration (µg/m^3)	0.01	0.01	0.01
Does measured concentration exceed NAAQS (1.5 µg/m^3)	No	No	No
Maximum Calendar Quarter Concentration (µg/m^3)	0.01	0.01	0.01
Does measured concentration exceed CAAQS (1.5 µg/m^3)	No	No	No
Sulfate (SO_4^{2-})			
Maximum 24-hour Concentration (µg/m^3)	6	7	14
Does measured concentration exceed CAAQS (25 µg/m^3)	No	No	No

AAM = annual arithmetic mean

ppm = parts per million by volume

µg/m^3 = micrograms per cubic meter

N/A = Not available at this monitoring station.

[a] *As of 2019, no monitoring stations within the Air Basin demonstrated an exceedance of the Pb NAAQS. Attainment redesignation for Pb is currently pending with the USEPA. Values presented represent ambient concentrations from the SRA 1 monitoring station.*

Source: SCAQMD, Historical Data By Year (2022–2024), www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed July 29, 2025.

Project Site. Minor emissions sources, such as boilers or emergency generators, are located within the Project vicinity, but no substantial permitted stationary sources (e.g., gasoline stations, dry cleaners, chrome plating operations) of TAC emissions within the Project Site vicinity were identified.

The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool (CalEnviroScreen) that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site is located in the 96th percentile, which means that the Project Site is worse than average in terms of pollution in comparison to other communities within California.[36]

[36] *OEHHA, CalEnviroScreen 4.0 MAP, https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/, accessed April 9, 2024.*

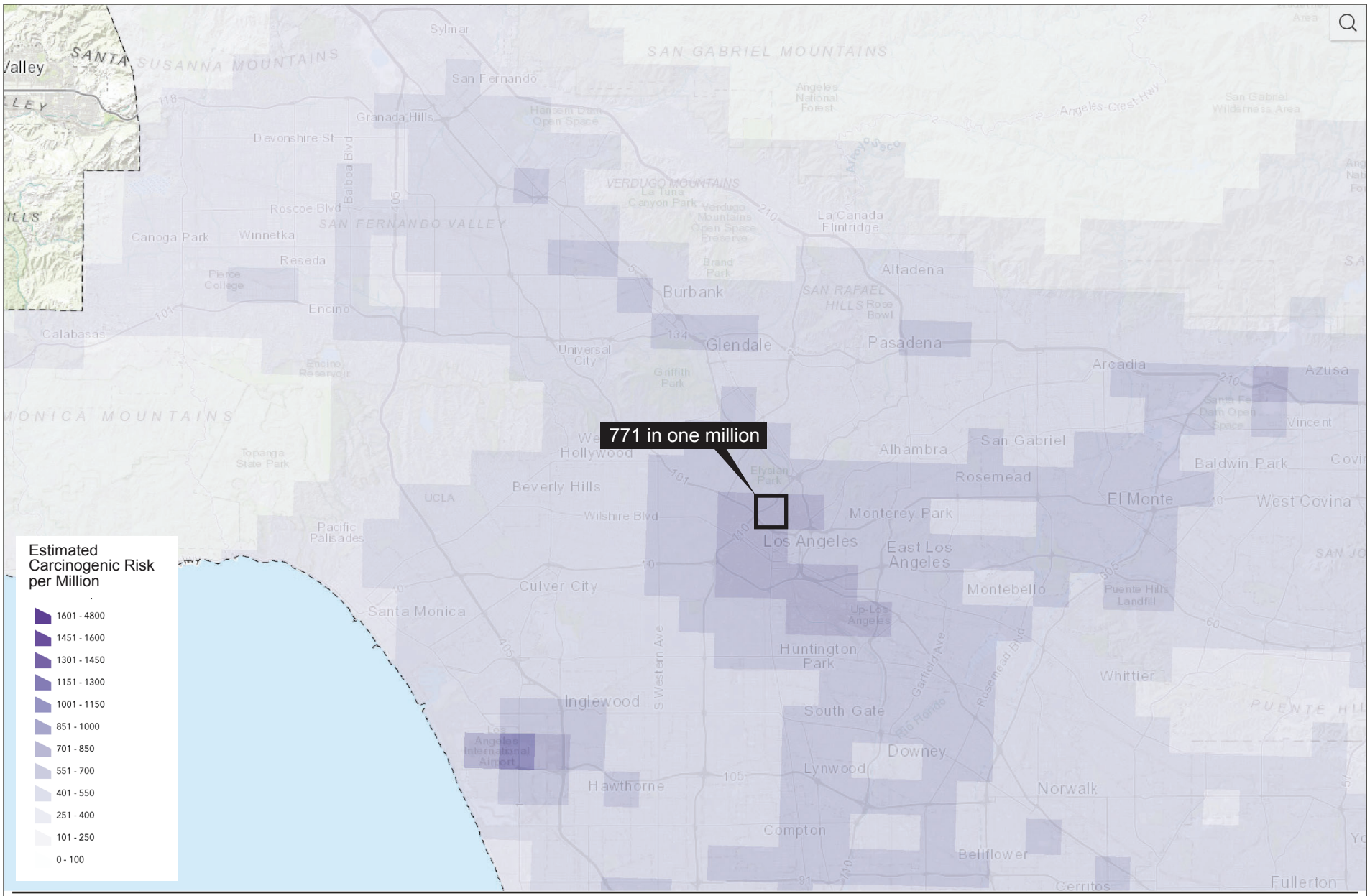

Figure IV.A-3
MATES V Total Cancer Risk for Project Area

Source: South Coast AQMD, 2021.

(c) Surrounding Uses

As shown in Figure IV.A-4 on page IV.A-30, the area surrounding the Project Site is urbanized and includes a mix of low- to mid-rise buildings containing a variety of industrial, commercial, and residential uses. Directly north of the Project Site, across West College Street, is a surface level parking lot with proposals for future mixed-use development and an existing low-rise industrial building. To the east of the Project Site, across North Main Street, are existing industrial buildings and a multi-level self-storage facility. To the west of the Project Site, across North Alameda Street, are the Los Angeles County Metropolitan Transportation Authority (Metro) Light Rail Overpass, which includes the Metro A Line, and office and residential developments. To the south of the Project Site are additional industrial buildings and another surface parking lot.

(d) Sensitive Uses

Some population groups, including children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to air pollution than others. Sensitive land uses in the Project vicinity include residential uses discussed above and are shown in Figure IV.A-4. Future potential residential uses are also located to the north across West College Street approximately 20 meters (i.e., approximately 65 feet) from the Project Site. As such, these potential future residential uses would experience the high levels of Project emissions. All other air quality sensitive receptors are located at greater distances from the Project Site and would be less impacted by Project emissions. Therefore, the Project's local (ambient) impacts are quantified only for the sensitive receptors depicted in Figure IV.A-4.

(e) Existing Project Site Emissions

The Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site, but it contains a billboard, parking lights, a cargo storage container, six electric bus chargers, and fencing. To provide a conservative analysis of the Project, estimates of Project emissions presented below do not assume any existing source emissions to determine the net increase in emissions generated by on-site uses (i.e., Project emissions were assumed to be all new emissions).

Figure IV.A-4
Air Quality Sensitive Receptors Locations

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

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

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

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

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

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

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

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

(2) 2006 L.A. CEQA Thresholds Guide

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

(a) Construction

(i) Combustion Emissions from Construction Equipment

- Type, number of pieces and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (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

A proposed project would normally have a significant impact on air quality from project operations if any of the following would occur:

- 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 utilizes the thresholds of significance in SCAQMD's *CEQA Air Quality Handbook*[37] and supplemental information published by SCAQMD, as identified below, to assess the significance of the Project's estimated air quality impacts. The supplemental information published by SCAQMD includes, but is not limited to, SCAQMD Air Quality Significance Thresholds, LSTs, $PM_{2.5}$ Significance Thresholds and Calculation Methodology, On- and Off-Road Emissions Factors, and potential mitigation strategies.[38] Specifically, Table IV.A-3 on page IV.A-34 shows SCAQMD's currently recommended significance thresholds, which provide numerical thresholds for evaluating the significance of a project's estimated air quality emissions.

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

[38] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed July 29, 2025.*

Table IV.A-3
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds[a]		
Pollutant	**Construction[b]**	**Operation**
NO_X	100 lbs/day	55 lbs/day
VOC[b]	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[c]	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[d]		
NO_2 1-hour average Annual Arithmetic Mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual Average	10.4 $\mu g/m^3$ (construction)[e] & 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] *Please note that the SCAQMD significance threshold is in terms of VOC while the California Emissions Estimator Model (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] *While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for Pb, Project construction and operation would not include sources of Pb emissions and would not exceed the*

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

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

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

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

Source: SCAQMD, March 2023.

(a) Construction

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

- Emissions from the Project's direct and indirect sources would exceed any of the SCAQMD significance threshold levels identified in Table IV.A-3 on page IV.A-34.

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

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

(b) Operation

Based on the criteria set forth in SCAQMD's *CEQA Air Quality Handbook*,[39] the Project would have a significant impact if the Project's operational estimated emissions would cause any of the following to occur:

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

- Regional emissions from the Project's direct and indirect sources exceed any of the SCAQMD significance threshold levels identified in Table IV.A-3 on page IV.A-34.

- Maximum on-site daily localized emissions exceed the LSTs, 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).[40]

- Maximum on-site localized operational PM_{10} and $PM_{2.5}$ emissions exceed the incremental 24-hr threshold of 2.5 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.[41]

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

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

(c) Toxic Air Contaminants

Based on the criteria set forth in SCAQMD's *CEQA Air Quality Handbook*, the Project would have a significant TAC impact, if:[42]

- The Project emits carcinogenic or TACs that exceed the maximum incremental chronic and acute cancer risk as provided in Table IV.A-3 on page IV.A-34.

- 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.[43] 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.

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

[41] *SCAQMD, Final-Methodology to Calculate PM 2.5 and $PM_{2.5}$ Significance Thresholds, October 2006.*

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

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

(d) Consistency with Applicable Air Quality Plans

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with SCAQMD's *CEQA Air Quality Handbook*,[44] the following criteria were used to evaluate the Project's consistency with SCAQMD's AQMP:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations;
  - Cause or contribute to new air quality violations; or
  - 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 Air Quality Element is discussed below.

(e) Cumulative Impacts

Based on SCAQMD guidance, individual construction projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.[45] As discussed in SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution (August 2003):

> *As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the project-specific*

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

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

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.[46]

The cumulative analysis of air quality impacts within this Draft EIR follows SCAQMD's guidance such that construction or operational Project emissions would 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 SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with new development projects within the Air Basin, such as the Project. Instead, SCAQMD published the *CEQA Air Quality Handbook* in November 1993 to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects proposed in the Air Basin. The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*.[47]

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) EMission FACtor (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

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

[47] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed April 9, 2024.*

Quality Significance Thresholds.[48] SCAQMD also recommends using approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod). These recommendations were followed in the preparation of this analysis.

(1) Construction

Construction of the Project has the potential to generate temporary pollutant emissions through the use of heavy-duty construction equipment, such as excavators and cranes, and through vehicle trips generated from workers and haul and delivery trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NO_X, could result from the use of construction equipment. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

(a) Regional Emissions

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

CalEEMod is based on outputs from Off-road Emissions Inventory Program model[49] (OFFROAD) and EMFAC model,[50] 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

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[48] *SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed April 9, 2024.*

[49] *CARB, 2021 Off-road Diesel Emission Factors, https://arb.ca.gov/emfac/offroad/, accessed April 9, 2024.*

[50] *CARB, EMFAC 2021, Emissions, https://arb.ca.gov/emfac/, accessed April 9, 2024.*

factors) that can be used if site-specific information is not available. CalEEMod contains default values to use in each specific local air district region. Appropriate Statewide default values can be used, if regional default values are not defined. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. Construction tasks were aggregated to reflect overlapping tasks and identify the reasonably expected maximum construction emissions occurring over the course of Project construction. To be conservative, this analysis evaluates the Project's air quality impacts during construction based on reasonably expected maximum construction emissions even though such emissions would not occur throughout the entire construction phase. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix B of this Draft EIR.

(b) Localized Emissions

The localized effects from the on-site portion of daily construction emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling, where appropriate, to assess whether the Project's local emissions would exceed SCAQMD's significance thresholds, as described above.[51] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, and $PM_{2.5}$.[52] 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. For the Project, the most recent background ambient air quality monitoring data (2022–2024) for the Project area, as presented in Table IV.A-7 on page IV.A-64 in the analysis further below. SCAQMD developed mass rate look-up tables for each source receptor area to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are

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

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

less than or equal to 5 acres.[53] Although the trend shown in Table IV.A-7 on page IV.A-64 in the analysis further below demonstrates that ambient air quality is improving in the area, the localized construction emissions analysis conservatively did not apply a reduction in background pollutant concentrations for subsequent years of construction (i.e., 2027–2028). By doing so, the allowable pollutant increment to not exceed an ambient air quality standard is more stringent (i.e., incremental threshold would increase as background pollutant concentrations in future years decreases). The analysis and LSTs take into account existing background ambient air quality monitoring data (2022–2024). Calculations of the LSTs are provided in Appendix B of this Draft EIR.

(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). Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of the Project. Stationary source emissions are generated from the proposed emergency generator 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, included as Appendix I of this Draft EIR, which was conducted consistent with Los Angeles Department of Transportation's

[53] *As discussed below, the LSTs were derived for the 2.3-acre Project Site.*

(LADOT) *Transportation Assessment Guidelines*.[54] 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.[55] Area source emissions are based on landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Emissions associated with use of the emergency generator 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.

To determine if a significant air quality impact would occur, the regional operational emissions generated by the Project was compared against SCAQMD's significance thresholds.[56] 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 (i.e., days where testing of the emergency generator would occur). Operational emissions for both the Buildout and Existing conditions are calculated based on future buildout year. This is a conservative assumption as the CalEEMod and EMFAC models consider more stringent vehicle emissions standards for future years. Refer to Appendix B of this Draft EIR for additional information regarding methodology.

(b) Localized Emissions

(i) On-Site Emissions

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

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[54] *Gibson, Transportation Assessment for 130 College Project, Los Angeles, California, October 2024.*

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

[56] *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.).*

(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.[57]

It has been recognized that CO exceedances are caused by vehicular emissions,[58] primarily when idling at intersections.[59,60] Accordingly, vehicle emissions standards have become increasingly more stringent. Before the first vehicle emission regulations, cars in the 1950s were typically emitting about 87 grams of CO per mile.[61] 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,[62,63] and new cold weather CO standards have been implemented, effective for the 1996 model year.[64] 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).[65] With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Air Basin have steadily declined.

The analysis prepared for CO attainment in the Air Basin by SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[66] 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

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

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

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

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

[61] *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 October 18, 2023.*

[62] *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].*

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

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

[65] *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.*

[66] *SCAQMD, Federal Attainment Plan for Carbon Monoxide, 1992.*

the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.[67] 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.[68,69] 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).[70] SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.[71] Given that pages 2-3 of the SCAQMD guidance state that "the potential for public health impacts remains unchanged when siting sensitive receptors near a pollution source or a pollution source near a sensitive receptor," the City as Lead Agency has elected to use the siting distances in Table 1-1 of the CARB Handbook for evaluating health risk impacts from both TAC sources

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

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

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

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

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

and sensitive uses. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources and evaluating the potential for such sources to cause significant TAC impacts. Based on SCAQMD and CARB's guidance, 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 may be conducted. For the detailed analysis, downwind sensitive receptor locations are identified, and site-specific dispersion modeling is conducted to estimate Project impacts.

c. Project Design Features

No 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 the emergency generator. 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. As an example, the Project would comply with the City's EV charging requirements and provide a 500 kilowatt (kw) solar array in accordance with the California Energy Code.

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 whether or not the Project would be consistent and not conflict with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. In accordance with the procedures established in SCAQMD's *CEQA Air Quality Handbook* and supplemental information published by SCAQMD, the following criteria are required to be addressed in order to determine whether or not the Project would be consistent and not conflict 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;
  - Cause or contribute to new air quality violations; or

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

- Criterion 2: Would the project exceed the assumptions utilized in preparing the AQMP?
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP control measures?

(i) Criterion 1

With respect to the first criterion, as discussed under the analysis for Threshold (c), below, localized concentrations of NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ have been analyzed for the Project. Due to California Low Sulfur Diesel Fuel requirements, 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.[72] 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, they are classified as a precursor pollutant and only a regional emissions threshold has been established.

As shown in Table IV.A-5 on page IV.A-60 in the analysis further below, the increases in PM_{10} and $PM_{2.5}$ emissions during construction would not exceed the SCAQMD-recommended significance thresholds at sensitive receptors in proximity to the Project Site. Additionally, the Project's maximum potential NO_X and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table IV.A-7 on page IV.A-64 in the analysis further below, and detailed in Appendix B (CalEEMod Construction Output file) of this Draft EIR, NO_X and CO would not exceed the SCAQMD-recommended LSTs.

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

[72] *CARB, The California Diesel Fuel Regulations, Reflecting Amendments Effective February 16, 2014.*

post-construction motor vehicle operations.[73] As indicated under the analysis for Threshold (c), no intersections would require a CO hotspot analysis, and impacts would be less than significant.

An analysis of potential localized operational impacts from on-site activities was also conducted. As shown in Table IV.A-8 on page IV.A-67 in the analysis further below, localized emissions of NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ would not exceed the SCAQMD-recommended LSTs, and, as such, operational impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants and would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

(ii) Criterion 2

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

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

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

As described in Section IV.G, Land Use and Planning, of this Draft EIR, the City's General Plan serves as a comprehensive, long-term plan for future development of the City. Refer to Subsection 3.d.(1).(b) of Threshold (a) on page IV.A-52 for a discussion of the Project's consistency with applicable goals, objectives, and policies of the City's Air Quality Element.

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

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

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

According to the 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2024 was approximately 1,927,638 employees.[74] In 2028, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,967,307 employees.[75]

Based on generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 930 new employees.[76] Thus, the Project's estimated increase of 930 employees would constitute approximately 2.3 percent of the employment growth forecasted between 2024 and 2028 in the 2020–2045 RTP/SCS.[77] Therefore, the Project's contribution to employment growth would be consistent with projections contained in the 2020–2045 RTP/SCS. With regard to consistency with growth projections for the 2024–2050 RTP/SCS, the Project would represent approximately 2.2 percent of the projected employment growth in the SCAG Region between 2024 and 2028. Therefore, the Project's contribution to population and employment growth would be

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

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

[76] *Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions. The generation rate of 0.004 employees per square foot for "General Office" land use is applied to the 224,597 square feet of office space. The generation rate of 0.002 employees per square foot for "General Retail" land use is applied to the 4,110 square feet of retail space. The generation rate of 0.004 employees per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 5,894 square feet of restaurant space. As documented in Appendix A, VMT Analysis LADOT Calculator Worksheets, of the Project's Transportation Assessment (Appendix I of this Draft EIR), the Project would generate approximately 930 employees.*

[77] *The Project's projected number of employees (930) ÷ Increase in employment in City of Los Angeles subregion from 2024 to 2028 (39,669) = 2.3 percent.*

also consistent with projections contained in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS.

As discussed previously, the 2022 AQMP is based on the 2020–2045 RTP/SCS, which incorporates data from general plans, as well as local land use data, such as the Central City North Community Plan—the land use plan applicable to the Project Site. As demonstrated above, the Project-related employment growth would be well within the Citywide growth projections. As such, the Project would be consistent and not conflict with the growth projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

As discussed herein under Thresholds (a) through (d), the Project would not result in any significant air quality impacts and, therefore, would not require mitigation. In addition, the Project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) as required by SCAQMD and summarized above. In addition, as analyzed in detail below under Threshold (b), with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. Moreover, Project Design Feature GHG-PDF-1 presented in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, would further reduce the less-than-significant air quality impacts of the Project. Therefore, the Project is not required to implement air quality mitigation measures. As such, the Project would be consistent and not conflict with this AQMP consistency criterion.

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

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

With regard to land use developments, such as the Project, the 2020–2045 RTP/SCS land use control measures (i.e., goals and policies) focus on locating future growth within High Quality Transit Areas (HQTAs), as designated by the 2020–2045 RTP/SCS and a Livable Corridor/High Quality Transit Corridor (HQTC) as designated by the 2024–2050 RTP/SCS and which are areas with higher access to public transportation reducing vehicle

trips and VMT.[78,79,80] The Project represents an infill development within an existing urbanized area that would be wholly consistent with SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS as it is located within a Liveable Corridor and HQTC. The Project would be designed and constructed with sustainability and transit orientation as guiding principles. The Project Site is located approximately 130 feet east of the Metro A Line Chinatown Station, which is directly across North Alameda Street from the Project Site. The Project Site is also located in close proximity to stops for Metro Lines 70 and 76, the DASH Lincoln Heights/Chinatown stop, DASH Downtown Routes A, B, D, and E, and Santa Clarita Transit Lines 794 and 799. Moreover, the Project Site is located less than 0.5 miles north of Union Station, which is a hub for all major public transit lines in the region. The Project would also provide short- and long-term bicycle parking spaces in excess of the requirements of the LAMC.

As further discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project design includes characteristics, such as bicycle parking, lockers, and showers, that would reduce trips and VMT as compared to a standard project within the Air Basin as measured by the air quality model (i.e., CalEEMod).[81] While these Project characteristics primarily reduce GHG emissions, they would also reduce criteria air pollutants discussed herein. These relative reductions in vehicle trips and VMT from a standard project within the Air Basin help quantify the criteria air pollutant emissions reductions achieved by locating the Project on an infill site within an HQTA and Livable Corridor/HQTC, thereby promoting the use of alternative modes of transportation. Specifically, the Project would introduce office and commercial uses on the Project Site in proximity to existing residential, retail, restaurant, and other commercial uses, which would reduce VMT by encouraging walking and non-automotive forms of transportation and increase transit accessibility by locating new employment opportunities immediately adjacent to existing bus stops and across the street

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

[79] *SCAG, High Quality Transit Areas (HQTA) 2045—SCAG Region, https://gisdata-scag.opendata.arcgis.com/datasets/SCAG::high-quality-transit-areas-hqta-2045-scag-region/explore?location=34.150218%2C-117.742800%2C9.70, accessed October 18, 2023.*

[80] *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. SCAG also recognizes that many of these key corridors are also HQTCs.*

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

from the Metro A Line Chinatown Station. Details regarding VMT reduction due to Project Site characteristics are provided in Appendix B of this Draft EIR.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors, such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA developed equations, known as the USEPA Mixed-Use Development (MXD) model, to calculate trip reductions for multi-use developments.[82] The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features, such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. As shown in Appendix B of this Draft EIR, incorporation of USEPA MXD VMT reduction features and City requirements applicable to the Project would result in a 31-percent reduction in overall VMT and resultant pollutant emissions compared to the baseline ITE trip generation rates. Conservatively, this does not account for Mitigation Measure TR-MM-1, which includes pricing workplace parking and promotions and marketing to reduce VMT by an additional five percent.

As mentioned above, the Project would promote the use of alternative modes of transportation, including convenient access to public transit, opportunities for walking and biking, thereby facilitating a reduction in VMT. The Project is consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. Implementation of these sustainability features would contribute to a reduction in air quality emissions via a reduction in VMT. Accordingly, as the Project would support SCAG's and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent and not conflict with the 2020–2045 RTP/SCS (i.e., control measures of the AQMP).

In conclusion, the determination of AQMP consistency is primarily based on the Project's long-term impacts on air quality in the Air Basin. The Project represents an infill development near transit within an existing urbanized area that would concentrate new office and commercial uses within an HQTA/HQTC, thus reducing VMT. The Project would not

[82] *USEPA, Mixed-Use Trip Generation Model. www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed July 15, 2024.*

have a significant long-term impact on the region's ability to meet State and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement TCMs to control NO_X, PM_{10}, and $PM_{2.5}$ emissions. The Project would also be consistent with the goals and policies of the AQMP for the control of fugitive dust emissions. Therefore, as discussed above, the Project would be consistent and not conflict with the goals and policies of the AQMP.

(b) City of Los Angeles Policies

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

The Project would provide opportunities for the use of alternative modes of transportation and is located within an HQTA and Livable Corridor/HQTC, including access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. Specifically, the Project would include 149 bicycle parking spaces, consisting of 26 short-term spaces and 123 long-term spaces. In addition, the Project would be consistent with the development pattern in the vicinity that features greater concentration of urban density along major arterials and near transit options. The Project would also include primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and near major transit stops. Additionally, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would comply with City's applicable electric vehicle (EV) charging requirements, which include the provision of at least 30 percent of total parking spaces provided on the Project Site that are capable of supporting future electric vehicle supply equipment (EVSE) and a minimum of 10 percent of the total parking spaces on the Project Site to be equipped with EV charging stations. Provisions of the EVSE and EV parking spaces would help to facilitate and encourage use of alternative fueled vehicles.

A more detailed analysis of the Project's consistency with the City's General Plan is presented in Table IV.A-4 on page IV.A-53, which demonstrates the Project's consistency with these goals. Accordingly, the Project would promote the Air Quality Element's goals, objectives, and policies applicable to the Project.

Based on the above, the Project would be consistent and not conflict with applicable policies of the City's Air Quality Element. Refer to Section IV.G, Land Use and Planning, of this Draft EIR, for an analysis of the Project's consistency with the City's General Plan.

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

Goals, Objectives, and Policies	Would the Project Conflict?
Air Quality Element	
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	**No Conflict.** The Project would introduce a commercial development contributing to the continued development of the Central City North Community Plan area as an area for residential, employment, and retail services. The Project would also provide required short- and long-term bicycle parking spaces in excess of LAMC requirements. The Project's proximity to transit (i.e., Metro A Line Chinatown Station and stops used by multiple bus lines); proximity to residential, restaurant, and other retail/commercial uses; location within an HQTA and Livable Corridor/HQTC; and provision of bicycle parking spaces on-site would reduce vehicle trips and VMT by encouraging employees to walk or use other non-automotive forms of transportation to travel to nearby residences, dining, and shopping. Therefore, the Project would be consistent and 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.** As discussed above, the Project would be consistent with the relevant SCAG growth projections in the SCAG 2020–2045 RTP/SCS, which are used in preparing the 2022 AQMP. Accordingly, as determined above, the Project would reduce air pollutants consistent with the 2022 AQMP. More Specifically, the Project's location, land use characteristics, and Project Design Features would reduce emissions associated with natural gas and transportation. In addition, the Project would provide multi-modal transportation solutions to connect with surrounding public transit lines by providing bicycle parking spaces for the proposed uses in excess of the LAMC requirements and direct access to the Metro A Line Chinatown Station and adjacent stops for local and regional bus lines, encourage alternative means of transportation through walking and biking, and focus growth in a high-density, jobs-rich area in close proximity to transit. The Project would, thus, reduce air emissions and increase traffic mobility while also sustaining economic growth. Therefore, the Project would be consistent and not conflict with this objective.
Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites. **Policy 1.3.1:** Minimize particulate emission from construction sites.	**No Conflict.** Project construction would comply with SCAQMD Rule 403, which requires dust control measures during construction activities. The Project would require the construction contractor(s) to comply with the applicable provisions of CARB's In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of DPM 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

Table IV.A-4 (Continued)
Project Consistency with City of Los Angeles General Plan

Goals, Objectives, and Policies	Would the Project Conflict?
	parking lots with structured parking. Parking areas would be maintained in a clean and well-kept manner. The Project would, thus, reduce air emissions emanating from unpaved areas, parking lots, and construction sites. Therefore, the Project would be consistent and not conflict with this objective and policy.
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 mass transit, encouraging alternative modes of transit, thereby reducing VMT for future employees. Project employees would be served by multiple bus lines and the Metro A Line Chinatown Station, located directly across the street from the Project Site. The Project's mix of uses, proximity to residential uses and commercial services, and the option to use alternative modes of transportation would reduce reliance on single-occupant vehicles. Therefore, the Project would be consistent and not conflict with this goal.
Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	**No Conflict.** The Project Site is served by multiple bus lines and the Metro A Line Chinatown Station, located directly across the street from the Project Site. The Project's accessibility to mass transit would encourage employees to utilize alternative modes of transportation, which would contribute to the reduction in work trips. The Project's mix of uses, proximity to residential uses and commercial services, and the option to use alternative modes of transportation would help reduce trips, which is necessary to achieve regional air quality goals. Therefore, the Project would be consistent and not conflict with this objective.
Policy 2.1.1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**No Conflict**. The Project Site is served by multiple bus lines and the Metro A Line Chinatown Station, located directly across the street from the Project Site. The Project would include four pedestrian pathways that would connect to the existing sidewalk network. In addition, the Project would provide 149 bicycle parking spaces, including 26 short-term and 123 long-term spaces. The Project's mix of uses, proximity to residential uses and commercial services, and the option to use alternative modes of transportation would help reduce trips, VMT, and traffic congestion. Therefore, the Project would be consistent and not conflict with this policy.
Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	**No Conflict.** The Project would reduce VMT due to its infill location; mixed-use development in heavily populated area near Downtown LA, which is a regional jobs center; and in proximity to public transportation near the Project Site (i.e., the Metro A Line Chinatown Station directly across the street from the Project Site and

Table IV.A-4 (Continued)
Project Consistency with City of Los Angeles General Plan

Goals, Objectives, and Policies	Would the Project Conflict?
	multiple bus lines with a stop immediately adjacent to the Project Site). The Project's mix of uses, proximity to residential uses and commercial services, and the option to use alternative modes of transportation would help reduce trips, VMT, and mobile source emissions. Therefore, the Project would be consistent and not conflict with this goal.
Objective 4.1: It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.	**No conflict.** The Project's analysis, under Threshold (b), of potential air quality impacts relied upon the numeric significance thresholds established by SCAQMD, which considers attainment of the ambient air quality standards. The Project, with a mixed of office and commercial uses, would be developed in an HQTA and Livable Corridor/HQTC, which is a primary consideration in land use planning that contributes to the reduction in VMT, which, in turn, reduces air quality pollutant emissions. Therefore, the Project would be consistent and 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's environmental review and approval would occur at the local level. This Project-level EIR is being conducted by the City pursuant to CEQA requirements. Therefore, the Project would be consistent and not conflict with this policy.
Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and VMT associated with land use patterns.	**No Conflict.** The Project would reduce VMT, as shown in Appendix I, due to its infill location; development of office and commercial uses in a heavy populated area near residential uses, commercial services, and other job centers in Downtown; and in proximity to public transportation immediately adjacent to or across the street from the Project Site. Therefore, the Project would be consistent and not conflict with this objective.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**No Conflict.** The Project would improve accessibility for the City's residents to places of employment, shopping centers, and other establishments due to its infill location; mix of office, restaurant, and retail near residential uses and other places of employment; and access to public transportation immediately adjacent to or across the street from the Project Site. Therefore, the Project would be consistent and not conflict with this policy.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**No Conflict.** The Project contains internal pedestrian pathways that connect to the existing sidewalk network. In addition, the Project would provide 149 bicycle parking spaces, including 26 short-term and 123 long-term spaces. The Project would also comply with City requirements for providing EVSE and EV charging stations within the proposed parking areas. The Project would also locate a mix of office, restaurant, and retail/commercial services proximate to transit, including two DASH and four Metro bus lines and the

Table IV.A-4 (Continued)
Project Consistency with City of Los Angeles General Plan

Goals, Objectives, and Policies	Would the Project Conflict?
	Metro A Line Chinatown Station. Therefore, the Project would be compatible with pedestrians, bicycles, transit, and alternative fuel vehicles and would be consistent and 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 makers prior to taking any actions on the Project's discretionary approvals. Therefore, the Project would be consistent and not conflict with this policy.
Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**No Conflict.** The Project would occupy an infill location immediately adjacent to or across the street from existing public transportation, which would help promote transit usage and, in turn, reduce the number of vehicle trips to and from the Project Site. In addition, the Project would provide 149 bicycle parking spaces, including 26 short-term and 123 long-term spaces which would encourage biking in lieu of vehicle trips. Moreover, the Project is providing reduced parking compared to the ratios in the LAMC, encouraging alternative transit methods such as the use of public transportation. Therefore, the Project would be consistent and not conflict with this policy.
Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.	**No Conflict.** The Project's location, land use characteristics, and Project design elements would reduce emissions associated with energy and transportation. The Project would include bicycle parking spaces for the proposed uses in excess of the LAMC requirement and would be well-served by transit, including local and regional bus and rail lines located immediately adjacent to or across the street from the Project Site. Moreover, the Project would install EV charging stations at 10 percent of provided total new parking spaces on the new parking levels to encourage the use of less-polluting fuels. The Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and the emergency generator,. The Project would also provide shade trees in public areas, green walls in some outdoor areas, and vegetated roofs or cool roof systems, and building facades are designed to minimize solar heat gain, all of which would reduce energy demand. Lastly, the Project also includes a solar array as required by the California Energy Code. Therefore, the Project would be consistent and not conflict with this goal.
Objective 5.1: It is objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.	**No Conflict.** The Project's location, land use characteristics, and Project design elements would reduce emissions associated with energy and

Table IV.A-4 (Continued)
Project Consistency with City of Los Angeles General Plan

Goals, Objectives, and Policies	Would the Project Conflict?
Policy 5.1.2: Effect a reduction in energy consumption and shift to non-polluting sources of energy in its building and operations.	transportation. The Project would include bicycle parking spaces for the proposed uses in excess of the LAMC requirements and would be well-served by transit, including local and regional bus and rail lines located immediately adjacent to the Project Site or across the street from the Project Site. Moreover, the Project would install EV charging stations at 20 percent of the overall non-residential spaces. Lastly, the Project would prohibit the use of natural gas during operation with the exception of restaurant cooking equipment and the emergency generator pursuant to Project Design Feature GHG-PDF-1 and would include an on-site solar array as required by the California Energy Code, advancing the shift toward non-polluting sources of energy. Therefore, the Project would be consistent and not conflict with this objective and policy.
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.** While the Project would require a diesel emergency generator for emergency backup power, the generator would be subject to SCAQMD Rule 1470 pollutant emission limits. All other stationary sources (e.g., water heaters) would be electric. Therefore, the Project would be consistent and not conflict with this objective and policy.

Source: Eyestone Environmental, 2025.

(c) Conclusion

In conclusion, analysis of Threshold (a) was based on the Project's consistency with the AQMP as well as City plans and policies. The determination of AQMP consistency is primarily based on the long-term impacts of the Project on air quality in the Air Basin. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the State and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project is consistent with growth projections that form the basis of the 2022 AQMP, the Project would be consistent with the emissions forecasts in the AQMP. Furthermore, the Project would comply with all applicable regulatory standards identified in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, that would serve to reduce the criteria air pollutants discussed herein. Additionally, the Project proposes Project Design Feature GHG-PDF-1 (see Section IV.E, Greenhouse Gas Emissions, of this Draft EIR) that would further reduce the less-than-significant air quality impacts of the Project. Furthermore, as the Project would support the City's and SCAQMD's objectives of reducing

VMT and the related vehicular air emissions, the Project would be consistent and not conflict with AQMP control measures.

Based on the above, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and, therefore, impacts related to Threshold (a) would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

(1) Impact Analysis

(a) Regional Emissions

(i) Construction

Project construction would occur in sequential phases (e.g., demolition, foundation, grading, building construction) over 20 months, with buildout expected to be completed in 2028. Construction of the Project would commence with removal of the billboard, parking lights, a cargo storage container, bus chargers, and fencing and demolition of the surface parking areas. This phase would be followed by grading and excavation for the subterranean parking, which would extend to a depth of 17 feet below ground surface. The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. It is estimated that approximately 67,791 cubic yards of soil would be hauled from the Project Site during excavation.

Construction of the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from haul trucks and construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment, such as

dozers, loaders, and cranes. During the finishing phase of the Project, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Construction assumptions, including construction schedule, heavy-duty construction equipment mix, and the number of worker and delivery and haul truck trips, are included in Appendix B (CalEEMod Construction Output file).

The emissions levels in Table IV.A-5 on page IV.A-60 represent the highest daily emissions projected to occur during each year of construction. As presented in Table IV.A-5, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the SCAQMD daily significance thresholds for any of the criteria pollutants. Therefore, regional construction emissions resulting from the Project would result in a less-than-significant impact.

(ii) Operation

As discussed above in Section 3.b., SCAQMD's CalEEMod was used to calculate regional area, energy, mobile source, and stationary emissions. Table IV.A-6 on page IV.A-61 provides the Project's operational emissions. As shown in Table IV.A-6, regional emissions resulting from operation of the Project would not exceed any of SCAQMD's daily regional operational thresholds. The analysis accounts for the reduction in natural gas usage and related pollutant emissions with implementation of Project Design Feature GHG-PDF-1.[83] Therefore, regional operational emissions resulting from the Project would result in a less-than-significant impact.

(b) Localized Emissions

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

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[83] *As shown below in Table IV.A-6 footnote b, Appendix B of this Draft EIR also includes a CalEEMod model for the Project without Project Design Feature GHG-PDF-1. As shown therein, Project Winter emissions of VOCs, NO_x, and CO would increase to 13, 7, and 49, respectively, with no substantial increase in SO_X, PM_{10}, or $PM_{2.5}$ emissions, and all pollutants would be below the SCAQMD threshold. Project Summer emissions of VOCs, NO_x, and CO would increase to 16, 7, and 71, respectively, with no substantial increase in SO_X, PM_{10}, or $PM_{2.5}$ emissions, and all pollutants would be below the SCAQMD threshold. Thus, impacts would be less than significant with or without Project Design Feature GHG-PDF-1.*

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

Construction Year	VOC[b]	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Construction Emissions Winter						
Year 2027	2	29	28	<1	5	2
Year 2028	16	23	41	<1	8	2
Maximum Unmitigated Construction Emissions[c]	16	29	41	<1	8	2
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(59)**	**(71)**	**(509)**	**(150)**	**(142)**	**(53)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Regional Construction Emissions Summer						
Year 2027	2	57	42	<1	17	5
Year 2028	18	32	72	<1	13	3
Maximum Unmitigated Construction Emissions[c]	18	57	72	<1	17	5
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(57)**	**(43)**	**(478)**	**(150)**	**(133)**	**(50)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

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

[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.*

Source: Eyestone Environmental, 2025.

(i) Construction

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

Table IV.A-6
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout (2028)[a]

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Winter						
Area	6	<1	<1	<1	<1	<1
Energy (Natural Gas)[b]	<1	<1	<1	<1	<1	<1
Mobile	6	5	47	<1	12	3
Stationary (Emergency Generator)	<1	1	1	<1	<1	<1
Total Proposed Uses Emissions	**12**	**6**	**48**	**<1**	**12**	**3**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(43)**	**(49)**	**(502)**	**(150)**	**(138)**	**(52)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Summer						
Area	9	<1	18	<1	<1	<1
Energy (Natural Gas)[b]	<1	<1	<1	<1	<1	<1
Mobile	6	4	50	<1	12	3
Stationary (Emergency Generator)	<1	1	1	<1	<1	<1
Total Proposed Uses Emissions	**15**	**6**	**70**	**<1**	**12**	**3**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(40)**	**(49)**	**(480)**	**(150)**	**(138)**	**(52)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

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

[b] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates and account for Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and the emergency generator and the 500 kw solar array required by the California Energy Code. Appendix B of this Draft EIR also includes a CalEEMod model for the Project without Project Design Feature GHG-PDF-1. As shown therein, Project Winter emissions of VOCs, NO_x, and CO would increase to 13, 7, and 49, respectively, with no substantial increase in SO_X, PM_{10}, or $PM_{2.5}$ emissions, and all pollutants would be below the SCAQMD threshold. Project Summer emissions of VOCs, NO_x, and CO would increase to 16, 7, and 71, respectively, with no substantial increase in SO_X, PM_{10}, or $PM_{2.5}$ emissions, and all pollutants would be below the SCAQMD threshold. Thus, impacts would be less than significant with or without Project Design Feature GHG-PDF-1.*

Source: Eyestone Environmental, 2025.

(ii) Operation

Project-related operational emissions from on-site sources (e.g., the emergency generator and cooking appliances in restaurants) were also evaluated based on SCAQMD

LST methodology. The potential to cause or contribute to CO hotspots (potential exceedances of ambient air quality standards) from post-construction motor vehicle operations was also evaluated. As analyzed in Threshold (c) below, Project-related operational emissions from on-site and off-site sources would not exceed localized thresholds. Thus, localized operational emissions resulting from the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, localized operational emissions resulting from the Project would result in a less-than-significant air quality impact.

(c) Conclusion

According to SCAQMD guidance, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would have a cumulatively considerable contribution to emissions for those pollutants for which the Air Basin is in non-attainment. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.[84] As shown in Table IV.A-5 and Table IV.A-6 on pages IV.A-60 and IV.A-61, Project construction and operational daily emissions at the Project Site would not exceed any of SCAQMD's regional thresholds.[85] Similarly, construction and operational emissions from the Project would not exceed any of SCAQMD's localized significance thresholds at Project buildout as discussed under Threshold (c). Thus, construction and operation of the Project would have less-than-significant impacts with regard to regional and localized emissions. **Therefore, the Project's contribution to regional and localized cumulative air quality impacts would not be cumulatively considerable and, thus, would be less than significant. As such, Project impacts related to Threshold (b) would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

[85] *As shown above in Table IV.A-6, operational emissions would be less than significant both with and without Project Design Feature GHG-PDF-1.*

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 Subsection 3.b, Methodology, the localized construction air quality analysis was conducted using the methodology promulgated by SCAQMD. Look-up tables provided by SCAQMD were used to determine localized construction emissions thresholds for the Project.[86]

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for SRA 1 based on the approximately 2.3-acre Project Site. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residential uses located to the north, across West College Street. Ambient air quality standards for NO_x and CO have averaging times of 1-hour and 8-hour respectively. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters (approximately 82 feet). Based on SCAQMD LST methodology, projects with boundaries located closer than 25 meters to the nearest receptor (such as the Project) should use the LSTs for receptors located at 25 meters.[87]

The maximum daily localized emissions from Project construction and LSTs are presented in Table IV.A-7 on page IV.A-64. As presented in Table IV.A-7, maximum construction emissions would not exceed the SCAQMD localized screening thresholds. Therefore, the Project would not expose sensitive receptors to substantial localized construction emissions, and impacts would be less than significant.

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

Consistent with the CO methodology on page IV.A-43, if a project intersection does not exceed 400,000 vehicles per day, then the project is not required to prepare a detailed CO hot spot analysis.

The highest average daily trips at an intersection under the Existing Condition would be approximately 53,000 vehicles per day at the North Broadway and West College Street

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

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

Table IV.A-7
Estimate of Maximum Localized Daily Project Construction Emissions
(pounds per day)[a, b]

Construction Year	NO_X	CO	PM_{10}	$PM_{2.5}$
Winter				
Year 2027	19	24	1	<1
Year 2028	16	23	<1	<1
Maximum Unmitigated Daily Localized Emissions	**19**	**24**	**1**	<1
SCAQMD Localized Significance Thresholds[c]	**82**	**1,090**	**9**	**5**
Over/(Under)	**(63)**	**(1,066)**	**(8)**	**(4)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Summer				
Year 2027	15	23	<1	<1
Year 2028	24	33	<1	<1
Maximum Unmitigated Daily Localized Emissions	**24**	**33**	**<1**	**<1**
SCAQMD Localized Significance Thresholds[c]	**82**	**1,090**	**9**	**5**
Over/(Under)	**(57)**	**(1,057)**	**(8)**	**(4)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

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

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

[c] *Potential localized construction impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 1 for a 2.3-acre site, which utilizes a linear interpolation between the 2-acre and 5-acre screening thresholds. The closest existing sensitive receptor are residential uses 20 meters from the Project Site. The localized threshold is based on a 25-meter receptor distance, which is the closest receptor distance on the SCAQMD mass rate LST look-up table.*

Source: Eyestone Environmental, 2025.

intersection.[88] Project construction would result in a maximum of 60 worker trips (30 round trips), 100 vendor trips (50 round trips), and up to 160 haul trips (80 round trips) trips per day during the grading phase of construction. Please refer to Appendix B for detailed construction assumptions.

Conservatively assuming that all of the Project construction trips would drive through this intersection, it would result in approximately 53,380 vehicles per day (ambient and

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

Project construction trips), which is significantly lower than the daily traffic volumes of 400,000 vehicles per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[89] This daily trip estimate is based on the peak hour conditions of the intersection. The Project's off-site construction activities, including the highest daily trips, would not expose sensitive receptors to substantial CO concentrations. As a result, impacts related to localized construction mobile-source CO emissions would be less than significant.

(iii) Off-Site Construction Activities (TACs)

The greatest potential for TAC emissions during construction would be from DPM emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk, which is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the Project's short-term construction schedule of approximately 20 months, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, SCAQMD's CEQA guidance does not require a health risk assessment (HRA) for short-term construction emissions.[90] Therefore, based on SCAQMD's CEQA guidance, a quantitative evaluation of the Project's long-term cancer impacts from construction activities is not required since the Project's construction activities would occur over a relatively short duration. As such, the Project's construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations. Thus, 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 new major sources of air pollution within the Project Site. On-site emissions would include natural gas combustion for restaurant cooking equipment and the emergency generator, landscaping equipment, consumer products, and architectural coatings.[91] Emissions estimates for criteria air

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

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

[91] *Appendix B of this Draft EIR also includes a CalEEMod model for the Project without Project Design Feature GHG-PDF-1. As shown therein, Project Winter emissions of NO_x and CO would increase to 3 and 3, respectively, with no substantial increase in PM_{10} or $PM_{2.5}$ emissions, and all pollutants would be below the SCAQMD threshold. Project Summer emissions of NO_x and CO would increase to 3 and 20, respectively,*

(Footnote continued on next page)

pollutants from on-site sources are presented in Table IV.A-8 on page IV.A-67. The SCAQMD LST mass rate look-up tables, which apply to projects that have areas less than or equal to 5 acres in size, were used to evaluate potential localized impacts. As shown in Table IV.A-8, 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 above, Section 3.b.(2).(b).(ii), if a project intersection does not exceed 400,000 vehicles per day, then the project is not required to prepare a detailed CO hot spot analysis.

At buildout of the Project, the highest average daily trips at an intersection would be approximately 69,000 vehicles per day (ambient and Project) at the North Broadway and West College Street intersection,[92] which is lower than the daily traffic volumes of 400,000 vehicles per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[93] This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the North Broadway and West College 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.[94] In 2003, the 1-hour background CO concentration was 5 ppm and had decreased to 2 ppm in 2018.[95] Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. The supporting data for this analysis is included in Appendix B of this Draft EIR. The Project's off-site operational activities, including the highest average daily trips, would not expose sensitive receptors to

with no substantial increase in PM_{10} or $PM_{2.5}$ emissions, and all pollutants would be below the SCAQMD threshold. Thus, impacts would be less than significant with or without Project Design Feature GHG-PDF-1.

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

93 *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.*

94 *SCAQMD, Carbon Monoxide Redesignation Request and Maintenance Plan, February 2005.*

95 *SCAQMD, 2018 Air Quality Data Table.*

Table IV.A-8
Estimate of Maximum Localized Project Daily Operational Emissions—At Project Buildout (2028) (pounds per day)[a]

Emission Source	Pollutant Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Project Winter				
Area[b]	—	—	—	—
Energy (Natural Gas)	<1	<1	<1	<1
Stationary (Emergency Generator)	1	1	<1	<1
On-Site Total	**1**	**1**	**<1**	**<1**
SCAQMD Significance Threshold[b,d,e]	**82**	**1,090**	**2**	**2**
Over/(Under)	**(80)**	**(1,089)**	**(2)**	**(2)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Project Summer				
Area	<1	18	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Stationary (Emergency Generator)	1	1	<1	<1
On-Site Total	**2**	**19**	**<1**	**<1**
SCAQMD Significance Threshold[b,d,e]	**82**	**1,090**	**2**	**2**
Over/(Under)	**(80)**	**(1,071)**	**(2)**	**(1)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

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

[b] *CalEEMod assumes that there are no landscaping emissions during winter. The only other operational area source emissions are consumer products and architectural coatings which only emit VOCs. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs.*

[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates and account for Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment and the emergency generator and the 500 kw solar array required by the California Energy Code. Appendix B of this Draft EIR also includes a CalEEMod model for the Project without Project Design Feature GHG-PDF-1. As shown therein, Project Winter emissions of NO_x and CO would increase to 3 and 3, respectively, with no substantial increase in PM_{10} or $PM_{2.5}$ emissions, and all pollutants would be below the SCAQMD threshold. Project Summer emissions of NO_x and CO would increase to 3 and 20, respectively, with no substantial increase in PM_{10} or $PM_{2.5}$ emissions, and all pollutants would be below the SCAQMD threshold. Thus, impacts would be less than significant with or without Project Design Feature GHG-PDF-1.*

[d] *Potential localized operational impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 1 for a 2.3-acre site, which is interpolated between the 2-acre and 5-acre thresholds. The closest sensitive receptor is a residential use 20 meters from 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] *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.

substantial CO concentrations. As a result, impacts related to localized mobile-source CO emissions would be less than significant.

(iii) Toxic Air Contaminants

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the *Air Quality and Land Use Handbook: A Community Health Perspective*, (CARB 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).[96] SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.[97] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations is DPM emissions from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent facility operations (e.g., the emergency generator). However, these activities and the land uses associated with the Project are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It should be noted that SCAQMD recommends that HRAs be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions. The Project includes office and retail/restaurant uses, which would not generate a large number of heavy-duty truck trips. The Project total truck deliveries, including both diesel and non-diesel, would conservatively be 13 daily truck deliveries.

The Project would only result in minimal emissions of air toxics from the use of consumer products and landscape maintenance activities. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the Project. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). As a commercial development with office, restaurant, and retail uses, the Project would not include these types of potential industrial manufacturing process sources. As

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

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

discussed in Section IV.F Hazards and Hazardous Materials, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste since the routine transport, use, and disposal of large quantities of hazardous materials is typically associated with industrial and manufacturing uses which are not included in the Project. The 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 under the California Accidental Release Program (CalARP) and would not warrant further study under that program.

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

Based on the above, the Project's on- and off-site construction and operational emissions would not exceed the SCAQMD LSTs. Similarly, the Project's TAC emissions would not exceed SCAQMD thresholds. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts related to Threshold (c) would be less than significant.[98]

(3) Mitigation Measures

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

(4) Level of Significance After Mitigation

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

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

As discussed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR, the Project would not create or result in other emissions, such

[98] *As shown above in Table IV.A-8, localized operational emissions would be less than significant both with and without Project Design Feature GHG-PDF-1.*

as those leading to objectionable odors, that may impact a substantial number of people. As a commercial development with office, restaurant, and retail uses, the Project would not include land uses associated with odor complaints, which typically include agricultural uses, wastewater treatment plants, food processing, chemical plants, and landfills. **Thus, the Project would have a less than significant impact with respect to Threshold (d). No further analysis of this issue is required.**

e. Cumulative Impacts

(1) Impact Analysis

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

(a) Construction

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

(b) Operation

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

cumulatively considerable net increase of these criteria pollutants.[99] As operational emissions would not exceed any of SCAQMD's regional or localized significance thresholds, the emissions of non-attainment pollutants and precursors generated by Project operation would not be cumulatively considerable.

With respect to TAC emissions from Project operation, neither the Project nor any of the 21 related projects (which are largely residential, retail/commercial, and office in nature), would represent a substantial source of TAC emissions. Substantial TAC emissions are typically associated with large-scale industrial, manufacturing, and transportation hub facilities, which are subject to SCAQMD permitting and best available control technology (BACT) requirements to limit pollutant emissions. The Project and the related projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities. However, the Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. Pursuant to AB 1807, which directs CARB to identify substances as TACs and adopt airborne toxic control measures to control such substances, SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Air Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during operations of the Project and related projects would be less than significant. In addition, as discussed above, the Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines and, thus, would not contribute to a cumulative impact.

Therefore, during operation, cumulative air quality impacts associated with the Project and related projects would be less than significant.

(2) Mitigation Measures

Cumulative impacts with regard to air quality during both construction and operation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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