

IV. Environmental Impact Analysis

B. Air Quality

1. Introduction

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Project and evaluates whether Project emissions would conflict with or obstruct implementation of the applicable air quality 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 C.1 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 September 16, 2025.

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.B-1 on page IV.B-3.

At the regional level, the South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange, Riverside, and San Bernardino counties, including the Coachella Valley.³ The City of Los Angeles (City) is located within the South Coast Air Basin (Air Basin), which is a distinct geographic subarea within 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 SCAQMD's Air Quality Management Plan (AQMP), which incorporates regional demographic projections and integrated regional land use and transportation strategies SCAG's 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.

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

³ SCAQMD, *Map of Jurisdiction*, 1999.

**Table IV.B-1
Ambient Air Quality Standards**

Pollutant	Averaging Period	Federal Standard ^{a,b}	California Standard ^{a,b}	South Coast Air Basin Attainment Status ^c	
				California Standard ^d	Federal 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	Non-Attainment (Extreme)
Respirable Particulate Matter (PM ₁₀)	24 hour	150 µg/m ³	50 µg/m ³	Non-Attainment	Attainment
	Annual	—	20 µg/m ³		
Fine Particulate Matter (PM _{2.5})	24 hour	35 µg/m ³	—	Non-Attainment	Non-Attainment (Serious)
	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)	Attainment	Unclassified/ 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)	Attainment	Unclassified/ 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	Attainment	Partial Non-Attainment ^e
	Rolling 3-month average	0.15 µg/m ³	—		
Sulfates	24 hour	—	25 µg/m ³	Attainment	—
Hydrogen Sulfide (H ₂ S)	1 hour	—	0.03 ppm (42 µg/m ³)	Unclassified	—

ppm = parts per million by volume

µg/m³ = 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/m³ and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are expressed as a concentration that is not to be*

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

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: SCAQMD, Final 2022 AQMP, December 2022. Compiled by Eyestone Environmental, 2025.

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

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

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

pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

(3) Air Pollutant Types

(a) Criteria Pollutants

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

(i) Ozone (O_3)

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

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

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

after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

(iii) Carbon Monoxide (CO)

CO is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. In urban areas, such as the City, automobile exhaust accounts for the majority of CO emissions. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O₃, 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 (NO₂)

NO₂ 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, NO₂ is the most abundant in the atmosphere. As ambient concentrations of NO₂ 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 NO₂ than those indicated by regional monitors. NO₂ absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO₂ also contributes to the formation of PM₁₀. 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 O₃.

(v) Sulfur Dioxide (SO₂)

Sulfur oxides (SO_x) are compounds of sulfur and oxygen molecules. SO₂ is the predominant form found in the lower atmosphere and is a product of burning sulfur or materials that contain sulfur. Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO₂ are found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. Emissions of SO₂ aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness

of breath, and coughing. High levels of particulates appear to worsen the effect of SO₂, 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 (SO₄²⁻), hydrogen sulfide (H₂S), 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., H₂S [nuisance odor] and vinyl chloride), or otherwise account for these pollutants (i.e., SO₄²⁻ and visibility reducing particles) through other criteria pollutants. For example, SO₄²⁻ 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 (SO₄²⁻)

SO₄²⁻ are the fully oxidized ionic form of sulfur. SO₄²⁻ 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 SO₄²⁻ in the atmosphere. Effects of SO₄²⁻ exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. SO₄²⁻ 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 (H₂S)

H₂S is a colorless gas with the odor of rotten eggs. The most common sources of H₂S emissions are oil and natural gas extraction and processing and natural emissions from geothermal fields. Industrial sources of H₂S include petrochemical plants and kraft paper mills. H₂S 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 H₂S 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 H₂S 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., SO₄²⁻, 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 PM₁₀ 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 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

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

⁵ CARB, *Hydrogen Sulfide & Health*, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed September 16, 2025.

⁶ CARB, *Hydrogen Sulfide & Health*, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed September 16, 2025.

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

⁸ CARB, *Visibility-Reducing Particles and Health*, ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed September 16, 2025.

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

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 O₃-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 O₃, NO₂, and certain fine particles are formed. They are, therefore, regulated as "precursors" to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products.

(ii) TACs

TACs is a term used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and include both carcinogens and non-carcinogens. The California Air Resources Board (CARB) and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the USEPA, which are identified on the California Air Toxics Program's TAC List. TACs are also not classified as "criteria" air pollutants. The greatest potential for TAC emissions during construction is related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel-fueled delivery trucks and stationary emergency generators. The

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

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

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
- State Assembly Bill 98
- Additional Regulations/Program Specific to Warehouse/Light Industrial Projects
- 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.B-1 on page IV.B-3 shows the NAAQS currently in effect for each criteria pollutant and their corresponding attainment status. The Air Basin fails to meet national standards for O₃ 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.

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

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

¹⁴ USEPA, *Clean Air Act Overview, Clean Air Act Table of Contents by Title*, last updated April 28, 2025, www.epa.gov/clean-air-act-overview/clean-air-act-text, accessed September 16, 2025. As shown therein, Title I addresses nonattainment areas, and Title II addresses mobile sources.

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

(2) State

(a) California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both state and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table IV.B-1 on page IV.B-3 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State. As shown in Table IV.B-1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet State standards for O₃, PM₁₀, and PM_{2.5} and, therefore, is considered a State “non-attainment” area for these pollutants.

(b) California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by State agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to 5 minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

(c) State Programs for Toxic Air Contaminants

The California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and OEHHA determine if a substance should be formally identified, or “listed,” as a TAC in California. In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include

measures, such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment, in order to reduce public exposure to DPM and other TACs. These actions are also supplemented by the Assembly Bill (AB) 2588 Air Toxics “Hot Spots” program and Senate Bill (SB) 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management plan. SCAQMD has further adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

(d) 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 Vehicles* 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.

(e) State Assembly Bill 98

On September 29, 2024, Governor Gavin Newsom signed AB 98 into law, establishing various statewide warehouse design and build standards and requiring local governments to institute truck travel routes that minimize impacts on residential communities. AB 98 declares that the movement and storage of freight and the impact of this activity on public health and communities is a matter of statewide concern. As such, AB 98 adds Chapter 2.8, Warehouse Design and Build Standards, to the Government Code and additional sections to the Health and Safety Code relating to land use.

Under AB 98, “logistics use” means a building in which cargo, goods, or products are moved or stored for later distribution to business or retail customers, and where heavy-duty trucks are primarily involved in the movement of the cargo, goods, or products. “Logistics use” does not include retail facilities, facilities that are served primarily by rail, or a Strategic Intermodal Facility as defined by AB 98.

Starting on January 1, 2026, all new or expanded logistics use development must be sited on, and accessible via, arterial roads, major thoroughfares, or roads that predominantly serve commercially-oriented uses. Further, entry gates into the loading truck court must be positioned after a minimum of 50 feet of total available stacking depth inside the property line.

AB 98 does not apply to “logistics use” projects that commenced the local entitlement process prior to September 30, 2024, as long as development activity has commenced within five years of securing entitlement approvals, or to mixed-use developments that may create sensitive receptors on the site of the new logistics use, provided there are no existing sensitive receptors (e.g., residence, school, daycare facility, recreational areas primarily used by children, live-in housing, or hospitals) within 900 feet of a loading bay.

AB 98 sets forth additional requirements for developments within 900 feet of a sensitive receptor. Developments of 250,000 square feet or more must comply with Tier 1 21st century warehouse design elements, orient loading bays on the opposite side of the building from sensitive receptors, have a separate entrance for heavy-duty trucks, and locate the truck entrances/exits and internal circulation away from sensitive receptors. If the project is currently zoned industrial, all truck loading bays must be set back 300 feet from any property line abutting a sensitive receptor and must also include at least 50 feet of landscaped buffer adjacent to sensitive receptors. If the project is not zoned industrial or requires a rezone, loading bays must be set back at least 500 feet and must include at least 100 feet of landscaped buffer to screen sensitive receptors.

“21st century warehouse” means a logistics use that meets all of the following:

- Complies with or exceeds all requirements of the most current building energy efficiency standards specified in Part 6 (commencing with Section 100) of Title 24 of the California Code of Regulations and the California Green Building Standards Code (CALGreen Code, Part 11 of Title 24 of the California Code of Regulations), including, but not limited to, the following requirements related to:
 - Photovoltaic (PV) system installation and associated battery storage;
 - Cool roofing;
 - Medium- and heavy-duty vehicle charging readiness; and
 - Light-duty electric vehicle charging readiness and installed charging stations.
- Has skylights in at least 1 percent of the roof area, or equivalent light-emitting diode (LED) efficient lighting.

- Provides conduits and electrical hookups at all loading bays serving cold storage. Idling or use of auxiliary truck engine power to power climate control equipment shall be prohibited if the truck is capable of plugging in at the loading bay.
- Ensures that any heating, ventilation, and air-conditioning (HVAC) is high-efficiency.
- Ensures that all classes of forklifts used on site, pursuant to CARB's Zero-Emission Forklifts regulation, as drafted, shall be zero-emission by January 1, 2030, to the extent operationally feasible, commercially off-the shelf available, and adequate power available on site.
- Ensures that equipment used on site utilizing small off-road engines shall be zero-emission, to the extent operationally feasible, commercially off-the shelf available, and adequate power available on site.

(f) Additional Regulations/Program Specific to Warehouse/Light Industrial Projects

Heavy-Duty (Tractor-Trailer) GHG Regulation. The tractors and trailers subject to this regulation must either use USEPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies.¹⁵ The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low rolling resistance tires. Sleeper cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay verified low rolling resistance tires. There are also requirements for trailers to have low rolling resistance tires and aerodynamic devices. The Sustainable Freight Action Plan establishes a goal to improve freight efficiency by 25 percent by 2030, deploy over 100,000 freight vehicles and equipment capable of zero emission operation, and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.¹⁶

(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

¹⁵ *Smart way certified trailers are trailers that have verified low rolling resistances tires and one or more aerodynamic devices (e.g., trailer under fairing) that achieve a total fuel savings of at least 6 percent. For more information, please refer to <https://www.epa.gov/verified-diesel-tech/smartway-designatedtractors-and-trailers>.*

¹⁶ *California Air Resources Board, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017.*

portion of SCAQMD's jurisdiction as SCAQMD also regulates portions of the Salton Sea Air Basin and Mojave Desert Air Basin within Riverside County.

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

To meet the NAAQS and CAAQS, 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 O₃ 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 emissions¹⁷ sufficiently to meet the O₃ standard deadlines as NO_x plays a critical role in the creation of O₃. Since NO_x emissions also lead to the formation of PM_{2.5}, the NO_x reductions needed to meet the O₃ standards will likewise lead to improvement of PM_{2.5} levels and attainment of PM_{2.5} standards.¹⁸ The 2022 AQMP is focused on attaining the 2015 8-hour O₃ 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.¹⁹

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 SCAG's 2020–2045 RTP/SCS Plan.²⁰ 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

¹⁷ NO_x emissions are a precursor to the formation of both O₃ and secondary PM_{2.5}.

¹⁸ 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).

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

²⁰ SCAG, Final 2020–2045 RTP/SCS, September 3, 2020.

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.²¹ The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2020 AQMP, are based on the 2020–2045 RTP/SCS.

The 2022 AQMP forecasts the 2037 emissions inventories “with growth” based on SCAG’s 2020–2045 RTP/SCS. The region is projected to see a 12-percent growth in population, a 17-percent growth in housing units, an 11-percent growth in employment, and a 5-percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, State, and federal levels.²²

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.

²¹ SCAQMD, *Final 2022 AQMP, December 2022*, p. ES-2.

²² SCAQMD, *Final 2022 AQMP, December 2022*, Figure 1-4.

As discussed above, SCAG's 2020–2045 RTP/SCS forecasted population, housing, employment growth data were used to characterize regional growth in the 2022 AQMP.

(b) SCAQMD Air Quality Guidance Documents

SCAQMD published the *CEQA Air Quality Handbook* (approved by SCAQMD's Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.²³ 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 provided supplemental guidance on SCAQMD's website to be used in conjunction with the Handbook.²⁴

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.²⁵ 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.²⁶ 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*.²⁷ The latter document has been incorporated by SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

²³ SCAQMD, *CEQA Air Quality Handbook*, April 1993.

²⁴ SCAQMD, *Air Quality Analysis Handbook*, [www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)), accessed September 16, 2025.

²⁵ SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005.

²⁶ SCAQMD, *Final Localized Significance Threshold Methodology*, June 2003 (revised July 2008).

²⁷ SCAQMD, *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds*, October 2006.

(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:

- **Rule 401—Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than 3 minutes in any one hour, which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402—Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403—Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM₁₀ emissions to less than 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), 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.

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. The following is a list of rules that apply to the Project:

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

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

- **Rule 1403—Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

- **Rule 1470—Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition engines greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.
- **Rule 2305—Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program:** This rule requires warehouses greater than 100,000 square feet to directly reduce NO_x and DPM or to facilitate emission and exposure reductions of these pollutants. The WAIRE Program is a menu-based points system that will require warehouse operators to annually earn a specified number of points by completing actions from a menu. Menu items include acquiring or using Near Zero Emissions (NZE) and/or Zero Emissions (ZE) on-road trucks, ZE cargo handling equipment, ZE charging/fueling infrastructure, solar panels, or particulate filters for nearby sensitive land uses. Alternatively, warehouse operators could prepare and implement a custom plan specific to their site, or they could pay a mitigation fee. Funds from the mitigation fee would be used through future solicitations and SCAQMD Governing Board actions to incentivize the purchase of NZE or ZE trucks and ZE charging/fueling infrastructure in the communities near warehouses that paid the fee. Warehouse owners and operators would also have reporting and recordkeeping requirements.

(4) Local

(a) City of Los Angeles General Plan

(i) Air Quality Element

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

The most directly relevant of those plans, the City's General Plan Air Quality Element, was adopted on November 24, 1992, and sets forth the goals, objectives, and policies that guide the City in its implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies are relevant to land use development and relate to traffic mobility, minimizing particulate emissions from construction activities,

discouraging single-occupant vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency in City facilities and private developments.

The Air Quality Element establishes six goals:

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

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

(ii) Plan for a Healthy Los Angeles

The 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 degree of 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. O₃ 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 O₃ and PM_{2.5} and, therefore, is considered a federal non-attainment area for these pollutants. As discussed above, since 2019, no monitoring station within the Air Basin has demonstrated an exceedance for Pb of the national standard, and an attainment redesignation for Pb is currently pending with the USEPA.

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 emissions²⁸ sufficiently to meet the upcoming O₃ 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

²⁸ NO_x emissions are a precursor to the formation of both O₃ and secondary PM_{2.5}.

the 8-hour O₃ 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 O₃ standard. Although the existing air regulations and programs will continue to lower NO_x emissions in the region, an additional 67-percent reduction from the baseline year of 2018 in the year 2037 is necessary to attain the 8-hour O₃ standard.^{29,30}

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/SCS³¹ that are generally designed to reduce VMT.

As discussed previously, the 2022 AQMP forecasts the 2037 emissions inventories based on projected growth of 12 percent in population, 17 percent in housing units, 11 percent in employment, and 5 percent in VMT between 2018 and 2037. Despite past regional growth, air quality within the Air Basin has improved substantially over the years, primarily due to the impacts of air quality control programs at the local, state, and federal levels. Figure IV.B-1 on page IV.B-25 shows the percent change in air quality along with demographic data for the four-county region from the 2022 AQMP. In particular, Figure IV.B-1 illustrates the trends since 1995 of the 8-hour O₃ levels and the 1-hour O₃ levels, and trends since 2001 of the annual average PM_{2.5} concentrations, compared to the regional gross domestic product, total jobs, and population. Human activity in the region has an impact on achieving reductions in emissions. However, the O₃ 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.³²

²⁹ 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).

³⁰ SCAQMD, 2022 AQMP, 2022 (p. ES-4 2022 AQMP).

³¹ SCAG, Final 2020–2045 RTP/SCS, September 2020.

³² SCAQMD, Final 2022 AQMP, 2022 (p. 1-6).

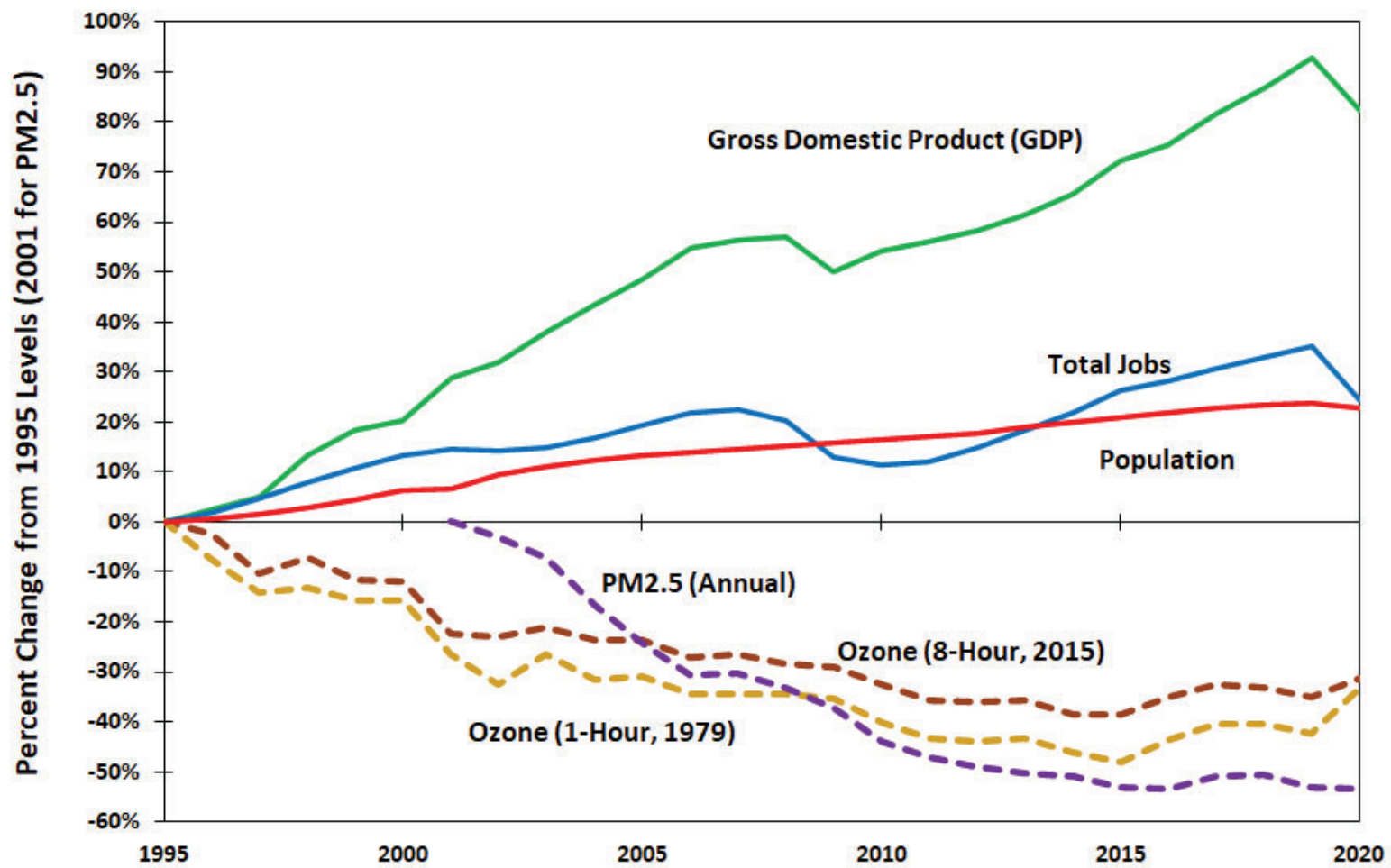


Figure IV.B-1
2022 AQMP Ozone Trends

SCAQMD has released the Multiple Air Basin Toxics Exposure Study (MATES-V), which was aimed at estimating the cancer risk from toxic air emissions throughout the Air Basin by conducting a comprehensive monitoring program, an updated emissions inventory of TACs, and a modeling effort to fully characterize health risks for those living in the Air Basin.³³ 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).³⁴

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.³⁵ Risk from less urbanized areas of the Air Basin ranges from less than 100 to 400 cancers per million. Generally, the risk from air toxics is lower near the coastline and higher risks are concentrated near large diesel sources (e.g., freeways, airports, and ports).

(2) Local Air Quality

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

³³ SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V) Final Report*, August 2021.

³⁴ SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V) Final Report*, August 2021.

³⁵ SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V)*, *MATES V Interactive Carcinogenicity Map*, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=view_38, accessed September 16, 2025.

(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.B-2 on page IV.B-28 shows the locations of the SRAs located in Los Angeles County. The Project Site is located within SRA 3, which covers the Southwest Los Angeles County area. The closest monitoring station with monitoring data representative of the Project Site is West Los Angeles Station, located at Wilshire Boulevard and Sawtelle Boulevard in the City of Los Angeles, approximately 7.5 miles northwest of the Project Site. Criteria pollutants monitored at this station include O₃ and NO₂. CO, PM₁₀, PM_{2.5}, are not monitored at this station. The next closest station that monitors CO, PM₁₀, PM_{2.5}, Pb, and SO₄ is the Downtown Los Angeles station located at 1630 North Main Street in the City of Los Angeles, approximately 12 miles northeast of the Project site. Table IV.B-2 on page IV.B-29 identifies the NAAQS and CAAQS for relevant air pollutants along with the ambient pollutant concentrations that have been measured at these stations through the period of 2022–2024.

(b) Existing Health Risk in the Surrounding Area

As shown in Figure IV.B-3 on page IV.B-31, based on the MATES-V model, the calculated cancer risk in the Project area is approximately 627 in one million.³⁶ The cancer risk in this area is predominately related to nearby sources of DPM (e.g., Los Angeles International Airport (LAX) and Interstate 405). Other sources in the Project vicinity include emergency generators, boilers, and char broilers. In general, the risk at the Project Site is comparable with other urbanized areas in Los Angeles.

(c) Surrounding Uses

The Project Site is located within the Westchester–Playa del Rey Community Plan area. The Project Site is designated as Limited Manufacturing and is zoned as [T][Q]M1-1 (Limited Industrial, Height District No. 1). As shown in Figure IV.B-4 on page IV.B-32, the Project Site is located in an urbanized area that includes a mix of low-rise buildings containing industrial, residential, and commercial uses.

³⁶ SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map*, 2021.



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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

Air Quality Reporting

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

To inform the AQMD's 15 million residents about air quality conditions, the AQMD issues an air quality forecast each day and reports current air quality conditions for each

numbered Monitoring Area and General Forecast Area depicted here.

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

Newspapers, television and radio stations typically will report air

quality information using the General Forecast Areas, shown in color below, which are larger groupings of the more specific Air Monitoring Areas.

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

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

General Forecast Areas & Air Monitoring Areas

Coastal

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

Metropolitan

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

San Fernando Valley

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

San Gabriel Valley

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

Inland Orange County

Central Orange County	17
Saddleback Valley	19
Capistrano Valley	21

Riverside Valley

Corona/Norco Area	22
Metropolitan Riverside	23

San Bernardino Valley

Northwest San Bernardino Valley	32
Southwest San Bernardino Valley	33
Central San Bernardino Valley	34
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Temecula/Anza Area

Temecula Valley	26
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San Gabriel Mountains

West San Bernardino Mountains	36
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San Bernardino Mountains

West San Bernardino Mountains	36
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Big Bear Lake

Big Bear Lake	38
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Banning Pass Area

Banning Pass Area	29
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Coachella/Low Desert

Coachella Valley	30
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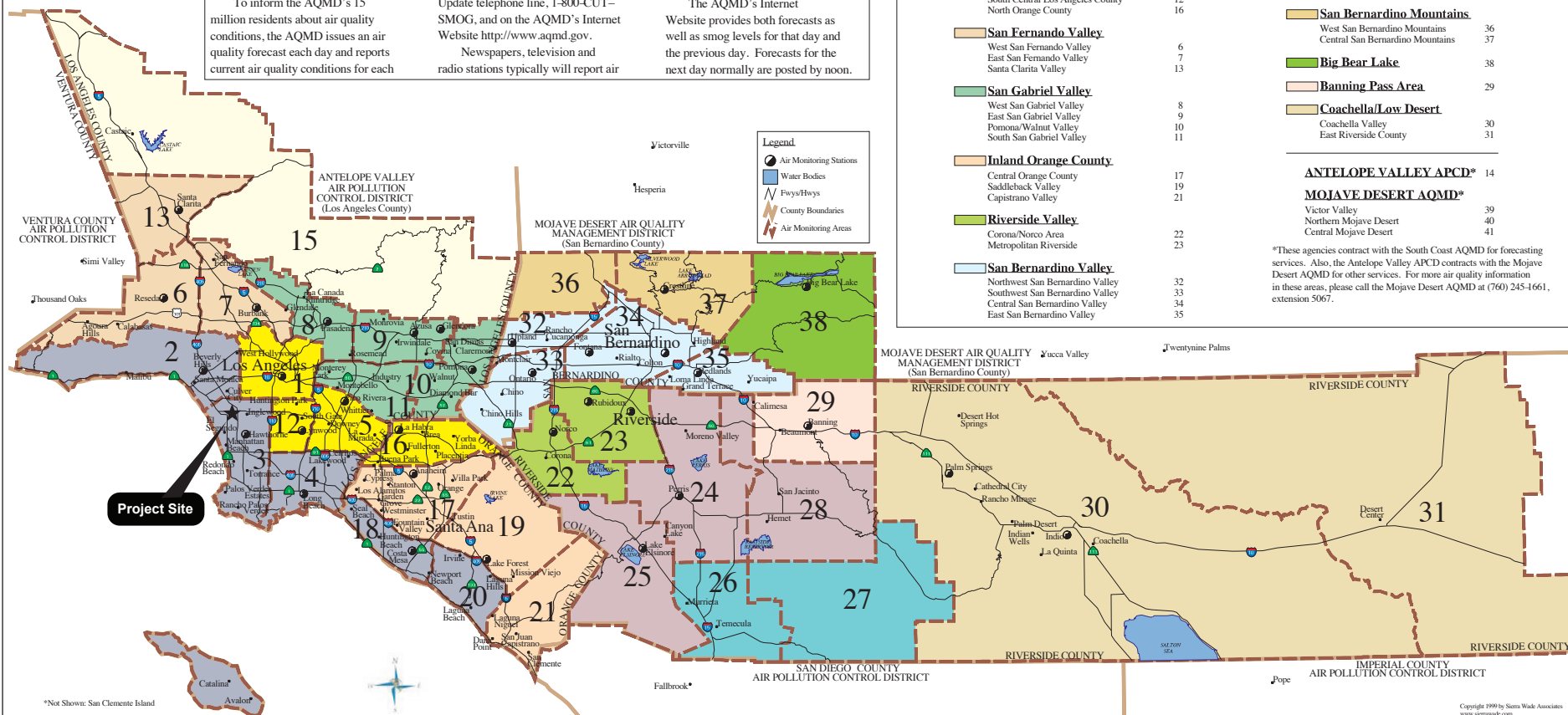
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*These agencies contract with the South Coast AQMD for forecasting services. Also, the Antelope Valley APCD contracts with the Mojave Desert AQMD for other services. For more air quality information in these areas, please call the Mojave Desert AQMD at (760) 245-1661, extension 5067.



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Figure IV.B-2
SCAQMD SRAs

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

Pollutant	Year		
	2022	2023	2024
Ozone (O₃)			
Maximum 1-hour Concentration (ppm)	0.08	0.11	0.09
Days exceeding CAAQS (0.09 ppm)	0	1	1
Maximum 8-hour Concentration (ppm)	0.070	0.064	0.058
Days exceeding NAAQS (0.070 ppm)	0	0	0
Days exceeding CAAQS (0.070 ppm)	0	0	0
Respirable Particulate Matter (PM₁₀)			
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	56
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 ppm)	0	0	0
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.05	0.04	0.04
Days exceeding CAAQS (0.18 ppm)	0	0	0
Annual Arithmetic Mean (ppm)	0.0114	0.0094	0.0095
Does measured AAM exceed NAAQS (0.0534 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
Sulfur Dioxide (SO₂)			
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
Annual Arithmetic Mean (ppm)	N/A	N/A	N/A
Does measured AAM exceed NAAQS (0.030 ppm)?	No	No	No

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

Pollutant	Year		
	2022	2023	2024
Lead^a			
Maximum 30-day Average Concentration ($\mu\text{g}/\text{m}^3$)	0.01	0.01	0.01
Does measured concentration exceed NAAQS ($1.5 \mu\text{g}/\text{m}^3$)	No	No	No
Maximum Calendar Quarter Concentration ($\mu\text{g}/\text{m}^3$)	0.01	0.01	0.01
Does measured concentration exceed CAAQS ($1.5 \mu\text{g}/\text{m}^3$)	No	No	No
Sulfate			
Maximum 24-hour Concentration ($\mu\text{g}/\text{m}^3$)	6	7	14
Does measured concentration exceed CAAQS ($25 \mu\text{g}/\text{m}^3$)	No	No	No
AAM = annual arithmetic mean ppm = parts per million by volume $\mu\text{g}/\text{m}^3$ = 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 lead NAAQS. Attainment redesignation for lead is currently pending with the USEPA. Values presented represent ambient concentrations from the SRA3 monitoring station for Year 2021; SRA2 for O_3 and NO_2; and SRA1 for all other pollutants for Years 2022–2023. Source: SCAQMD, Ambient Monitoring Data (2022–2024), www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed September 16, 2025.			

(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. As shown in Figure IV.B-4 on page IV.B-32, the closest sensitive land uses are residences located adjacent to the Project Site to the east, across Airport Boulevard to the northwest, and across Interceptor Street to the north. These residences would experience the highest levels of Project emissions.

(e) Existing Project Site Emissions

The Project Site is currently developed with an approximately 37,860-square-foot rental car facility. The Project Site currently has two single-story buildings with maintenance facilities and office uses, as well as surface parking. Mobile-source emissions are generated by motor vehicle trips to and from the Project Site. Area source emissions are generated by the use of maintenance equipment, landscape equipment, and products that contain solvents. Energy source emissions are typically associated with building natural gas usage. Table IV.B-3 on page IV.B-33 presents an estimate of the existing emissions within the Project Site.

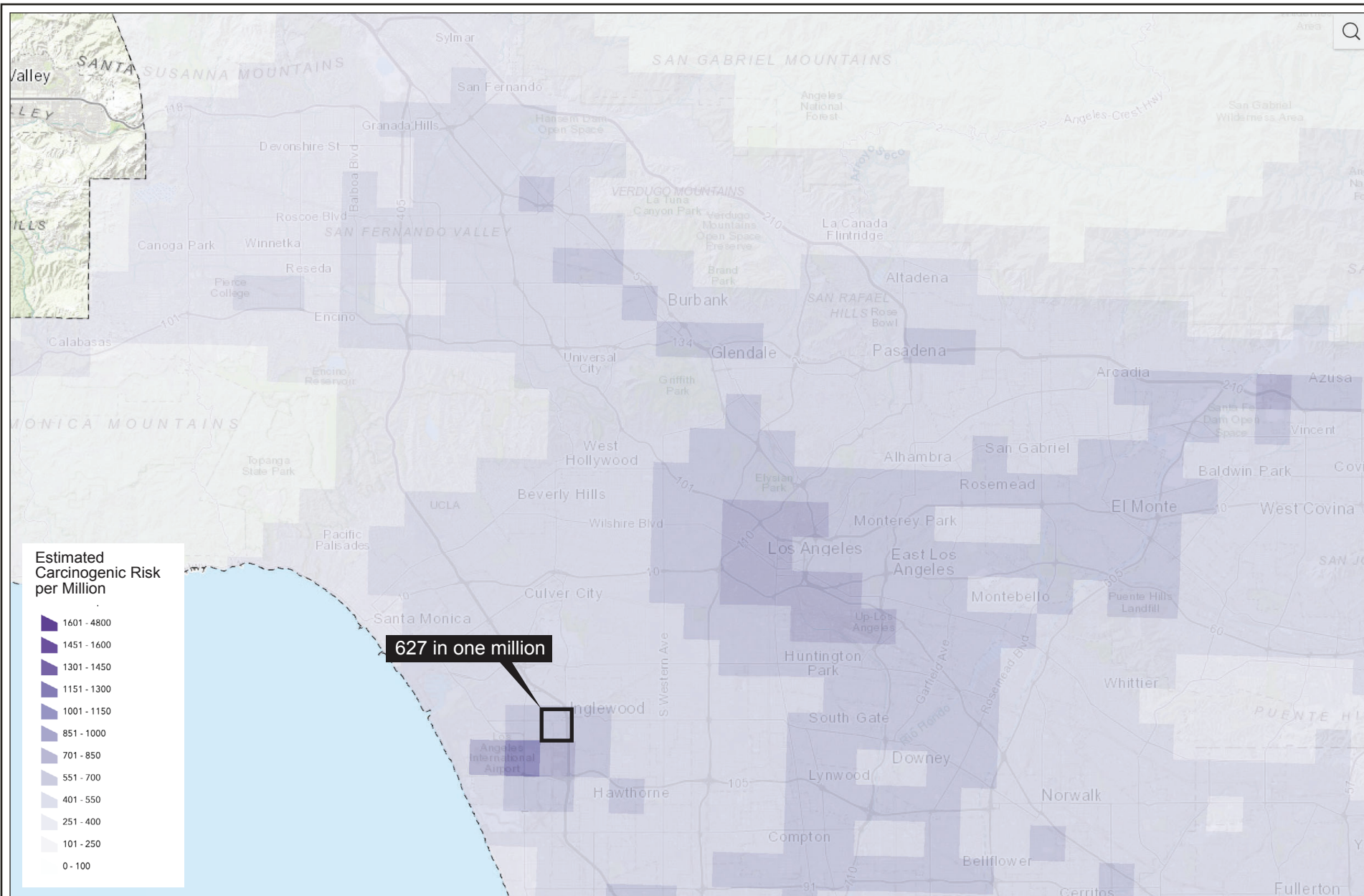


Figure IV.B-3
MATES V Total Cancer Risk for Project Area



Figure IV.B-4
Air Quality Sensitive Receptors Locations

Table IV.B-3
Estimated Existing (2024) Daily Regional Operational Criteria Pollutant Emissions^a

Emission Source	Pollutant Emissions (pounds per day)					
	VOC ^b	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Winter Emissions						
Area	1	0	0	0	0	0
Energy	<1	<1	<1	<1	<1	<1
Mobile	19	15	142	<1	29	8
Total Existing Winter Emissions	20	15	142	<1	29	8
Summer Emissions						
Area	1	<1	2	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	19	14	153	<1	29	8
Total Existing Summer Emissions	20	14	155	<1	29	8
Numbers may not add up exactly due to rounding. ^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C.1 (CalEEMod Output) of this Draft EIR. ^b It is noted that SCAQMD's significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions. Source: Eyestone Environmental, 2025.						

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with State CEQA Guidelines Appendix G (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 2006 *L.A. CEQA Thresholds Guide*, as appropriate and as presented below, to assist in answering the Appendix G Threshold questions.

(2) 2006 L.A. CEQA Thresholds Guide

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

(a) Construction

(i) Combustion Emissions from Construction Equipment

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

(ii) Fugitive Dust—Grading, Excavation and Hauling

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

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

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

(iv) Other Mobile Source Emissions

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

(b) Operation

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 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.

(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*, as identified below, to assess the significance of the Project's estimated air quality impacts. Specifically, Table IV.B-4 on page IV.B-37 shows SCAQMD's currently recommended significance thresholds, which provide numerical thresholds for evaluating the significance of a project's estimated air quality emissions.

(a) Construction

Based on the criteria set forth in SCAQMD's *CEQA Air Quality Handbook*,³⁷ the Project would have a significant impact with regard to construction emissions if any of the following would occur:

- Regional emissions from both direct and indirect sources would exceed any SCAQMD significance threshold levels identified in Table IV.B-4 on page IV.B-37.
- Maximum on-site daily localized emissions exceed the Localized Significance Thresholds (LST), resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m³] over a 1-hour period or 9.0 ppm [10,350 µg/m³] averaged over an 8-hour period) and NO₂ (0.18 ppm [338.4 µg/m³] over a 1-hour period, 0.1 ppm [188 µg/m³] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [56.4 µg/m³] averaged over an annual period).
- Maximum on-site localized PM₁₀ 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/m³ or 1.0 µg/m³ PM₁₀ averaged over an annual period.

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

**Table IV.B-4
SCAQMD Air Quality Significance Thresholds**

Mass Daily Thresholds ^a		
Pollutant	Construction	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		
NO₂ 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)	
PM₁₀ 24-hour average Annual Average	10.4 µg/m ³ (construction) ^e & 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM_{2.5} 24-hour average	10.4 µg/m ³ (construction) & 2.5 µg/m ³ (operation)	
SO₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal—99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO^c 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^e 30-day average Rolling 3-month average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal)	
<i>lbs/day = pounds per day</i>		
^a SCAQMD CEQA Handbook,, 1993, pages 6-2 and 6-3.		
^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.		

Table IV.B-4 (Continued)
SCAQMD Air Quality Significance Thresholds

^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 significance thresholds for lead. 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, 2023.
--

(b) Operation

Based on the criteria set forth in SCAQMD's *CEQA Air Quality Handbook*,³⁸ the Project would have a significant impact with regard to operational emissions if any of the following would occur:

- Regional emissions from both direct and indirect sources exceed any SCAQMD significance threshold levels identified in Table IV.B-4 on page IV.B-37.
- 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 NO₂ (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).³⁹
- Maximum on-site localized operational PM₁₀ and PM_{2.5} emissions exceed the incremental 24-hr threshold of 2.5 µg/m³ or 1.0 µg/m³ PM₁₀ averaged over an annual period.⁴⁰
- 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).

³⁸ SCAQMD, *CEQA Air Quality Handbook*, 1993.

³⁹ SCAQMD, *LST Methodology*.

⁴⁰ SCAQMD, *Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM_{2.5} Significance Thresholds*, October 2006.

(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:⁴¹

- The Project emits carcinogenic or TACs that exceed the maximum incremental cancer risk as provided in Table IV.B-4 on page IV.B-37.
- 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 1.0.⁴² 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.

In assessing impacts related to TACs in this section, the City used Appendix G as the thresholds of significance. The criteria identified above from the 2006 L.A. *CEQA Thresholds Guide* were used where applicable and relevant to assist in analyzing the Appendix G thresholds. In addition, the following criteria set forth in SCAQMD's *CEQA Air Quality Handbook* served as quantitative air quality standards used to evaluate project impacts under Appendix G thresholds:

- The Project results in the exposure of 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 1.0.⁴³ 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.

(d) Consistency with Applicable Air Quality Plans

CEQA Guidelines Section 15125 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 and SCAG regional plans and policies, including the AQMP:

⁴¹ SCAQMD, *CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a project) and Chapter 10 (Assessing Toxic Air Pollutants)*, 1993.

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

⁴³ *The hazard index is the ratio of a TAC's concentration divided by its Reference Concentration or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose noncancer health risks.*

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

- 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 General Plan's Air Quality Element is discussed.

(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 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

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

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

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

b. Methodology

The Project proposes to construct one of two possible building plans for industrial warehouse buildings with ancillary office space. The single building option (Option 1) would be comprised of up to 435,390 square feet of combined industrial warehouse and office space. The three-building option (Option 2) would be comprised of up to 410,065 square feet of combined industrial warehouse and office space. This analysis focuses on the potential change in the air quality environment due to implementation of the Project and addresses impacts from the two options. 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 SCAQMD's website and includes (1) Emission FACTor model (EMFAC) on-road vehicle emission factors, (2) background CO concentrations, (3) localized significance thresholds, (4) mitigation measures and control efficiencies, (5) mobile source toxics analysis, (6) off-road mobile source emission factors, (7) PM_{2.5} significance thresholds and calculation methodology, and (8) updated SCAQMD Air Quality Significance Thresholds.⁴⁸ SCAQMD also recommends using approved models to

⁴⁷ SCAQMD, *Air Quality Analysis Handbook*, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed on September 16, 2025.

⁴⁸ SCAQMD, *Air Quality Analysis Handbook*, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed on September 16, 2025.

calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod). These recommendations were followed in the preparation of this analysis.

(1) Construction

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

(a) Regional Emissions

The Project's "regional" emissions refer to emissions that will be evaluated based on regional significance thresholds established by 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 model⁴⁹ (OFFROAD) and EMFAC,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 factors) that can be used if site-specific information is not available. CalEEMod contains default values to use

⁴⁹ CARB, 2021 Off-road Diesel Emission Factors, <https://arb.ca.gov/emfac/offroad/>, accessed September 16, 2025.

⁵⁰ CARB, EMFAC 2021, <https://arb.ca.gov/emfac/>, accessed September 16, 2025.

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 C.1 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, PM₁₀, and PM_{2.5}.⁵² SCAQMD does not provide an LST for SO₂, Pb, and H₂S 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 O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

SCAQMD recommends that project-specific modeling be performed for projects that exceed 5 acres of active construction or operations. As the Project would have an active construction area larger than five acres, consistent with SCAQMD's LST Guidelines, dispersion modeling was run using USEPA's Regulatory Model AERMOD to assess the downwind extent of criteria pollutant concentrations from proposed construction and operational activities.⁵³ AERMOD accounts for a variety of refined, site-specific conditions that facilitate an accurate assessment of Project impacts. AERMOD's air dispersion

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

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

⁵³ SCAQMD, *Final-Localized Significance Threshold Methodology*, 2008.

algorithms are based upon a planetary boundary layer turbulence structure and scaling concepts, including the treatment of surface and elevated sources in simple and complex terrain.

(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, yard trucks (used to move trailers and containers within the Project Site), and the use of consumer products. Energy source emissions are generated as a result of activities in buildings for which natural gas is used. 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 a 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 offsite power plants, the majority of which burn fossil fuels. Because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered to be the maximum feasible level of mitigation for stack emissions. CalEEMod, therefore, does not calculate criteria pollutant emissions from regional power plants associated with on-site use.

Similar to construction, SCAQMD's CalEEMod model was used to estimate Project emissions during operation. Mobile-source emissions were calculated using CalEEMod. The annual VMT was based on the average daily trip (ADT) generation and average trip distance traveled for trucks and passenger vehicles provided by Gibson Transportation Consulting.⁵⁴ Overall average daily vehicle trips (passenger vehicles and trucks) were based on the City of Los Angeles Department of Transportation's (LADOT) VMT Calculator Version 1.5 and fleet mix assumptions from SCAQMD's 2014 *Warehouse Truck Trip Study Data Results and Usage*. The average truck trip distance was conservatively assumed to be 26.2 miles (distance to Port of Los Angeles) even though many of the trips could be much shorter given the close proximity of LAX.

⁵⁴ Gibson Transportation Consulting, Inc., *Truck Trip Estimates for 9000 Airport Boulevard, Los Angeles, California, September, 2025*. See Appendix I.3 of this Draft EIR.

Area source emissions are based on natural gas (e.g., building heating and water heaters), landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Natural gas usage factors in CalEEMod, to the extent considered, are based on the California Energy Commission California Commercial End Use Survey data set, which provides energy demand by building type and climate zone. Emissions associated with use of emergency generators were calculated using CalEEMod, in which emission factors are based on Table 3.4-1 (Gaseous Emission Factors for Large Stationary Diesel Engines) from USEPA's AP-42: Compilation of Air Pollutant Emission Factors for Stationary Sources. The emissions are based on the horsepower rating of the diesel generator and the number of hours operated per year for testing purposes. It is anticipated that the Project would utilize up to 16 electric forklifts and 2 diesel-powered yard trucks for daily operations. However, it was conservatively assumed that six of the forklifts would be propane forklifts. The Project could also include Transport Refrigeration Units (TRUs), which are refrigeration systems powered by diesel internal combustion engines designed to refrigerate perishable products that are transported in various containers, including truck vans and semi-truck trailers. As the Project would include distribution center uses, diesel emissions were calculated for trucks traveling to and from the site, idling, and maneuvering.

To determine if a significant air quality impact would occur, the net increase in regional operational emissions generated by the Project was compared against SCAQMD's significance thresholds.⁵⁵ To be conservative, this analysis evaluates the Project's air quality impacts during operations based on reasonably expected maximum operational emissions even though such emissions would not occur throughout the entire operational phase. The net increase in operational emissions is calculated based on Project operational emissions minus existing operational emissions. Operational emissions for both the Project and existing conditions are calculated based on future buildout year. This is a conservative assumption as the CalEEMod and EMFAC models take into account more stringent vehicle emissions standards for future years and, thus, results in lower emissions to offset emissions from proposed land uses. Refer to Appendix C 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 as discussed in Section 3.b.(2)(a) and evaluation of these emissions consistent with SCAQMD's

⁵⁵ SCAQMD, *SCAQMD Air Quality Significance Thresholds*, revised March 2015. SCAQMD based these thresholds, in part, on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, *CEQA Air Quality Handbook*, April 1993, pp. 6-1 and 6-2).

LST methodology discussed above in Section 3.b.(1)(b). Dispersion modeling was performed using the USEPA AERMOD model to determine localized impacts from Project operations.

(ii) Off-Site Emissions

Potential localized CO concentrations from induced traffic at nearby intersections are also addressed, consistent with the methodologies and assumptions used in the consistency analysis provided in the 2003 AQMP. The 2003 AQMP was the latest AQMP to perform the modeling attainment demonstration for CO.⁵⁶

It has been recognized that CO exceedances are caused by vehicular emissions,⁵⁷ primarily when idling at intersections.^{58,59} Accordingly, vehicle emissions standards have become increasingly more stringent. Before the first vehicle emission regulations, cars in the 1950s were typically emitting about 87 grams of CO per mile.⁶⁰ Since the first regulation of CO emissions from vehicles (model year 1966) in California, vehicle emissions standards for CO applicable to light duty vehicles have decreased by 96 percent for automobiles,^{61,62} and new cold weather CO standards have been implemented, effective for the 1996 model year.⁶³ Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (with provisions for certain cars to emit even less).⁶⁴ With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Air Basin have steadily declined.

The analysis prepared for CO attainment in the Air Basin by 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

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

⁵⁷ USEPA, *Air Quality Criteria for Carbon Monoxide*, EPA 600/P-099/001F, 2000.

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

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

⁶⁰ USEPA, *Timeline of Major Accomplishments in Transportation, Air Pollution, and Climate Change*, www.epa.gov/air-pollution-transportation/timeline-major-accomplishments-transportation-air-pollution-and-climate, accessed on September 16, 2025.

⁶¹ National Academy Board on Energy and Environmental Systems, *Review of the 21st Century Truck Partnership*, 2008, Appendix D: *Vehicle Emission Regulations* [excerpt from http://books.nap.edu/openbook.php?record_id=12258&page=107].

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

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

⁶⁴ CARB, *California Exhaust Emission Standards and Test Procedures for 2001 and Subsequent Model Passenger Cars, Light-duty Trucks, and Medium-duty Vehicles*, amended September 27, 2010.

Plan for Carbon Monoxide (1992 CO Plan).⁶⁵ As discussed in the 1992 CO Plan, peak CO concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was 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.⁶⁶ The AQMP CO hotspots modeling also accounted for worst-case meteorological conditions and background CO concentrations. The Los Angeles County Metropolitan Transportation Authority (Metro) evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level E at peak morning traffic and Level F at peak afternoon traffic.^{67,68} As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. If a project would potentially result in a CO hotspot based on the initial screening, detailed modeling may be performed using California LINE Source Dispersion Model, version 4 (CALINE4), which is a model used to assess air quality impacts near transportation facilities (i.e., roadways, intersections, and parking facilities).

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

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB's Handbook).⁶⁹ SCAQMD adopted similar recommendations in its *Guidance*

⁶⁵ SCAQMD, *Federal Attainment Plan for Carbon Monoxide*, 1992.

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

⁶⁷ Metro measured traffic volumes and calculated the LOS for the intersection Wilshire Boulevard/Sepulveda Boulevard, which is a block east of Interstate 405 along Wilshire Boulevard.

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

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

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

c. Project Design Features

The Project would include several project design features that could contribute in minimizing air quality emissions as follows:

Project Design Feature AIR-PDF-1: All off-road diesel-powered equipment greater than 50 horsepower (hp) used during Project grading/excavation activities will meet USEPA Tier 4 Final emissions standards. A copy of each such unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit will be provided on-site at the time of mobilization of each applicable unit of equipment to allow the construction monitor to compare the on-site equipment with the inventory and certified tier specification and operating permit.

Project Design Feature AIR-PDF-2: The Project will include at least four tractor trailer parking stalls capable of supporting future electric vehicle supply equipment (EVSE) for Option 1 and six tractor trailer parking stalls capable of supporting future EVSE for Option 2.

Project Design Feature AIR-PDF-3: Electrical outlets will be provided for charging of forklifts.

Project Design Feature AIR-PDF-4: Electrical hookups will be provided for all loading bays to prevent unnecessary idling or use of auxiliary truck engine power to power climate control equipment.

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

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) SCAQMD CEQA Air Quality Handbook Policy Analysis

To assess whether the Project would conflict with or obstruct implementation of an applicable air quality plan, this analysis evaluates the Project's consistency with SCAQMD's AQMP and SCAG's RTP/SCS. In accordance with SCAQMD's *CEQA Air Quality Handbook*, Chapter 12, the following criteria are considered as part of this evaluation:

- 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 below under the analysis of Threshold (c), localized concentrations of NO₂ (as NO_x), CO, PM₁₀, and PM_{2.5} have been analyzed for the Project. Due to California Low Sulfur Diesel Fuel requirements, calculations shown below demonstrate that SO₂ emissions would be negligible during construction and long-term Project operations and, therefore, would not have the potential to cause or affect a violation of the SO₂ ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O₃ formation, they are classified as a precursor pollutant and only a regional emissions threshold has been established.

The Project's maximum potential NO_x, CO, PM₁₀, and PM_{2.5} daily emissions during construction were analyzed to determine potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table IV.B-6 on page IV.B-62 in the analysis of Threshold (b) further below, localized NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} would not exceed SCAQMD-recommended localized significance thresholds.

Because the Project would not introduce any substantial stationary sources of emissions (e.g., gasoline stations, dry cleaners, chrome plating operations), CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.⁷¹ As indicated under the analysis for Threshold (c), no intersections would require a CO hotspot analysis, and impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause, contribute to new CO violations, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

An analysis of potential localized operational impacts from on-site activities was also conducted. As shown in Table IV.B-9 on page IV.B-69 in the analysis of Threshold (c) further below, localized NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} operational impacts would be less than significant.

(ii) Criterion 2

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

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

A project is consistent with the 2022 AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the

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

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) starting on page IV.B-55, City of Los Angeles Policies, below, for a discussion of the Project's consistency with applicable goals, objectives, and policies of the City's General Plan Air Quality Element. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population and employment growth. The population and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. Economic assumptions, including employment rates and migration due to jobs, are also included as part of the RTP/SCS forecast projections.

While the Project would generate short-term construction jobs, these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed and are not typically brought from other regions to work on developments, such as the Project. Moreover, these jobs would be relatively small in number, representing hundreds of employees for the Project directly in relation to hundreds of thousands of jobs accounted for in the RTP/SCS forecast, and would be temporary in nature. Therefore, the Project's construction jobs would 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.⁷² In 2027, the earliest occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,957,390 employees.⁷³

Based on employee generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate 637 net new employees under Option 1 and 642 net new employees under Option 2, which would constitute approximately 2.1 percent under Option 1 and Option 2 of the employment growth forecasted between

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

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

2024 and 2027 (approximately 29,752 employees) based on the 2020–2045 RTP/SCS.^{74,75,76} With regard to consistency with growth projections for the 2024–2050 RTP/SCS, the estimated maximum employment generated by the Project would similarly represent approximately 2.1 percent of the projected employment growth under both Option 1 and Option 2 in the SCAG Region between 2024 and 2027.^{77,78} Therefore, the Project's contribution to population and employment growth would be also consistent with projections contained in the 2020–2045 RTP/SCS.

As discussed previously, the 2022 AQMP is based on the 2020–2045 RTP/SCS, which incorporates data from general plans, as well as local land use data, such as the Community Plan. The Project-related employment growth would be well within the Citywide growth projections. As such, the Project would be consistent with the growth projections in the AQMP. As similar employment projections form the basis of the 2022 AQMP, the Project would be consistent with the projections in the AQMP.

- Does the project implement feasible air quality mitigation measures?

The Project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) required by SCAQMD, as summarized above. The Project also would incorporate pollutant reduction measures discussed above and in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, to support and promote environmental sustainability. While

⁷⁴ LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The employee generation rate 0.001 employee per square foot for "Light Industrial" land use is applied to the 37,860 square feet of rental car facility to be removed. The rate of 0.001 employee per square foot for "Light Industrial" land use is applied to the 355,390 square feet of industrial uses to be constructed under Option 1 and the 320,056 square feet of industrial uses to be constructed under Option 2. The rate of 0.004 employee per square foot for "General Office" land use is applied to the 80,000 square feet of office to be constructed under Option 1 and the 90,000 square feet of office to be constructed under Option 2. The existing structures to be removed generated approximately 38 employees (rental car facility 37,860 square feet * 0.001 = 38). Under Option 1, the Project would generate an estimated 675 employees (light industrial 355,390 square feet * 0.001 = 355) + (office 80,000 square feet * 0.004 = 320). Accounting for the existing uses to be removed, the Project would generate an estimated 637 net new employees. Under Option 2, the Project would generate an estimated 680 employees (light industrial 320,056 square feet * 0.001 = 320) + (office 90,000 square feet * 0.004 = 360). Accounting for the existing uses to be removed, the Project would generate an estimated 642 net new employees.

⁷⁵ Project's net increase in employees (637) ÷ Increase in employment in City of Los Angeles subregion from 2024 to 2027 (29,752) = 2.1 percent.

⁷⁶ Project's net increase in employees (642) ÷ Increase in employment in City of Los Angeles subregion from 2024 to 2027 (29,752) = 2.1 percent.

⁷⁷ Project's net increase in employees (637) ÷ Increase in employment in City of Los Angeles subregion from 2024 to 2027 (31,088) = 2.1 percent.

⁷⁸ Project's net increase in employees (642) ÷ Increase in employment in City of Los Angeles subregion from 2024 to 2027 (31,088) = 2.1 percent.

these features are designed primarily to reduce GHG emissions, they would also reduce emissions of the criteria pollutants discussed herein. Furthermore, implementation of Project Design Feature AIR-PDF-1, which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards; Project Design Feature AIR-PDF-2, which would require infrastructure capable of supporting future EVSE for tractor trailers; Project Design Feature AIR-PDF-3, which requires electrical hookups for charging forklifts; and Project Design Feature AIR-PDF-4, which requires electrical hookups for all loading bays, set forth above, would further reduce the less-than-significant localized air quality impacts. Overall, as demonstrated in this section, air quality impacts would be less than significant. As such, the Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the control measures set forth in the AQMP?

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

With regard to land use developments, such as the Project, SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS land use control measures (i.e., goals and policies) focus on the reduction of vehicle trips and VMT. As discussed in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would support a number of land use policies of the City and SCAG that would reduce vehicle trips and VMT.

The Project would promote a more balanced distribution of land uses through the introduction of a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and strategically located in proximity to LAX and major regional roadways. The Project would be developed in a City-designated Transit Priority Area (TPA) and a SCAG-designated High Quality Transit Corridor (HQTC) well-served by public transit. The Project is located within close proximity to a variety of public transit options provided by Metro, Santa Monica Big Blue Bus (BBB), Culver CityBus, and Beach Cities Transit. The Project Site is also located less than 0.4 miles of the Metro K Line LAX/Metro Transit Center Station and LAX Automated People Mover (APM) Intermodal Transportation Facility stops. The Project would also implement TDM measures in compliance with the City's TDM Ordinance to reduce the number of single-occupant vehicle trips to the Project Site. Specifically, the Project's TDM measures as required by the existing TDM Ordinance (LAMC 12.26 G) include bicycle parking in accordance with LAMC 12.21 A; displaying local transit information to promote and market alternative transportation modes and choices; designated carpool parking spaces, as well as loading and unloading areas;

and safe pedestrian and bicycle connections to off-site facilities. Additionally, the Project would provide preferential parking for carpools and low-emitting and zero emission vehicles, and 30 percent of the Project's parking spaces would be designated as electric vehicle (EV) spaces capable of supporting future EVSE, with 20 percent of the spaces equipped with EVSE to create EV charging stations. Additionally, trucks on-site would be required to comply with CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation, which requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that would reduce fuel consumption and associated emissions. The development of the Project in an area with convenient access to public transit and opportunities for walking and biking for Project employees, as well as the Project's close proximity to LAX's cargo service providers and major regional roadways, would facilitate a reduction of vehicle trips, VMT, and air pollution. As shown below, the Project would not exceed any SCAQMD localized significance thresholds for air quality emissions.

As further discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project design includes characteristics that would reduce trips and VMT as compared to a standard project within the Air Basin as measured by CalEEMod. While these Project characteristics primarily reduce GHG emissions, they would also reduce criteria air pollutants discussed herein. These relative reductions in vehicle trips and VMT 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 a TPA and HQTIC that promotes alternative modes of transportation.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA has sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors, such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA has developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.⁷⁹ 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 C.1, incorporation of USEPA MXD VMT reduction features and City requirements applicable to

⁷⁹ USEPA, *Mixed-Use Trip Generation Model*, www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed on September 16, 2025.

the Project results in a 13-percent reduction in overall VMT and resultant pollutant emissions compared to the baseline ITE trip generation rates.⁸⁰

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

(b) City of Los Angeles Policies

To achieve the goals of the Air Quality Element, performance-based standards have been adopted to provide flexibility in implementation of its policies and objectives. The Air Quality Element goals, objectives, and policies that are relevant to the Project and the analysis of the Project's consistency with these goals, objectives, and policies are presented in Table IV.B-5 on page IV.B-56. The Project would promote these Air Quality Element goals, objectives, and policies. As discussed above, the Project would promote a more balanced distribution of land uses through the introduction of a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and strategically located in proximity to LAX and major regional roadways. The Project would be developed in a City-designated TPA and a SCAG-designated HQTC well-served by public transit. The Project Site is located within close proximity to a variety of public transit options and would implement TDM measures as required by the TDM Ordinance. Additionally, the Project would provide preferential parking for carpools and low-emitting and zero emission vehicles and provide EVSE in compliance with City and CALGreen Code requirements. Provision of the EVSE and EV charging stations would help to facilitate and encourage use of alternative fueled vehicles. A more detailed analysis of the Project's consistency with the City's General Plan is presented in Table IV.B-5, which identifies specific goals and policies of the City's General Plan and demonstrates the Project's consistency with these goals.

In conclusion, analysis of Threshold (a) was based on the Project's consistency with the AQMP, as well as the City of Los Angeles plans and policies. The determination of AQMP consistency is primarily concerned with the long-term influence 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

⁸⁰ Refer to Appendix C.1, Greenhouse Gas Worksheets, GHG Parameters, VMT, included in Appendix C.1 (Air Quality and Greenhouse Gas Worksheets) of this Draft EIR.

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

Recommendation	Analysis of Project Consistency
Air Quality Element	
Goal 1: Good air quality and mobility in an environment of continued population growth and health economic structure.	No Conflict. The Project would promote a more balanced distribution of land uses through the introduction of a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and strategically located in proximity to LAX and major regional roadways. The Project would also provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. The increase in transit accessibility and the bicycle parking spaces provided on-site would further reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation. As such, the Project would not conflict with this goal.
Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.	No Conflict. The Project's location, land use characteristics, and Project design features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be consistent with the relevant 2020–2045 RTP/SCS growth projections, which are used in preparing the 2022 AQMP. The growth projections in the SCAG 2024–2050 RTP/SCS are similar to the growth projections in the SCAG 2020–2045 RTP/SCS. The Project would include bicycle parking spaces for the proposed uses as required by the LAMC and would be well-served by transit, including local and regional bus lines. The Project would also provide multi-modal transportation solutions to connect with surrounding public transit lines, encourage alternative means of transportation, and focus growth in a high-density area in close proximity to transit and housing. Thus, the Project would reduce air emissions and increase traffic mobility while also sustaining economic growth. As such, the Project would not conflict with this objective.
Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites. Policy 1.3.1: Minimize particulate emission from construction sites.	No Conflict. The Project would comply with SCAQMD Rule 403, which requires dust control measures during construction activities. The Project would require the construction contractor(s) to comply with the applicable provisions of CARB's In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of 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 parking lots with structured parking. Parking areas would be maintained in a clean and well-kept manner. Thus, the Project would reduce particulate emissions emanating from unpaved areas, parking lots, and construction sites.

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

Recommendation	Analysis of Project Consistency
	As such, the Project would not conflict with the 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 a TPA and HQTC in close proximity to residential, restaurants, retail, and commercial uses, thereby reducing the VMT of future employees because employees have the opportunity to walk or bike to work and access dining and shopping opportunities in the vicinity of the Project Site. Future employees on the Project Site would also have access to local bus lines and transit, as well as the use of bicycle parking spaces provided on the Project Site. The Project's proximity to both a job center and housing, as well as options for the use of alternative modes of transportation, would reduce reliance on single-occupant vehicles. As such, the Project would not conflict with this goal.
Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	No Conflict. Refer to the discussion of Project consistency with Goal 2, above.
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 is required to comply with the City's TDM Ordinance. The Project's TDM measures as required by the existing TDM Ordinance (LAMC 12.26 G) include bicycle parking in accordance with LAMC 12.21 A; displaying local transit information to promote and market alternative transportation modes and choices; designated carpool parking spaces, as well as loading and unloading areas; and safe pedestrian and bicycle connections to off-site facilities. As such, the Project would not conflict with this policy.
Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	No Conflict. Refer to the discussion of Project consistency with Goal 2, Objective 2.1, and Policy 2.1.1. Accordingly, the Project would contribute to the promotion of equitable land use decisions in the City that would result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services. As such, the Project would not conflict with this goal.
Objective 4.1: It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.	No Conflict. The Project analysis of potential air quality impacts relied upon the numeric indicators established by SCAQMD, which considers attainment of the ambient air quality standards. As discussed above, air quality impacts would be less than significant and would not cause or contribute to an exceedance of the ambient air quality standards. The Project also incorporates land use characteristics, including its proximity to transit that would reduce land use planning-related air pollutant emissions. As such, the Project would not conflict with this objective.

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

Recommendation	Analysis of Project Consistency
Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and VMT associated with land use patterns.	No Conflict. Refer to the discussion of Project consistency with Goal 2, Objective 2.1, and Policy 2.1.1, above.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	No Conflict. The Project would improve accessibility to a generator of employment with a new, modern industrial center with essential logistical infrastructure capable of supporting efficient goods movement and strategically located in proximity to LAX and major regional roadways. The Project is located in close proximity to residential areas and local-serving retail and restaurants in an urban area. The Project Site is located within close proximity to a variety of public transit options provided by Metro, Santa Monica BBB, Culver CityBus, and Beach Cities Transit. The Project Site is also located less than 0.4 miles of the LAX/Metro Transit Center Station, which serves as a stop for the Metro K Line, and the future LAX Automated People Mover (APM) Intermodal Transportation Facility stops. As such, the Project would not conflict with this policy.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	No Conflict. The Project would incorporate pedestrian pathways that would connect to the existing sidewalk network. In addition, the Project would provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. The Project would also comply with City requirements for providing EV charging infrastructure and EV charging stations within the proposed parking areas. As such, the Project would not conflict with this policy.
Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	No Conflict. The environmental review conducted for the Project, and set forth in this Draft EIR, includes an analysis of air quality impacts. The decision-makers for the discretionary actions needed for approval of the Project will consider the environmental review and any additional analysis contained in the Final EIR prior to taking any action on the Project. As such, the Project would not conflict with this policy.
Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	No Conflict. Refer to the discussion of Project consistency with Goal 2, Objective 2.1, and Policy 2.1.1, above.
Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.	No Conflict. The Project's location, land use characteristics, and Project design features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be within the relevant SCAG growth projections in the SCAG 2020–2045 RTP/SCS, which are used in preparing the 2022 AQMP. The Project would include bicycle parking spaces for the proposed uses as required by the LAMC and would be well-served by transit, including local and regional bus lines.

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

Recommendation	Analysis of Project Consistency
	Moreover, The Project would also comply with the CALGreen Code and City EV charging requirements. In addition, the Project would implement GHG-PDF-1, which requires that all new buildings be all-electric buildings. As such, the Project would not conflict with this goal.
Objective 5.1: It is objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments. Policy 5.1.2: Effect a reduction in energy consumption and shift to non-polluting sources of energy in its building and operations.	No Conflict. Refer to the discussion of Project consistency with Goal 5, above.
Objective 5.3: It is the objective of the City of Los Angeles to reduce the use of polluting fuels in stationary sources. Policy 5.3.1: Support the development and use of equipment powered electric or low-emitting fuels.	No Conflict. During operations, the Project would comply with CARB Small Offroad Engine (SORE) regulations, which ban the sale of combustion powered landscaping equipment starting in 2024 and small combustion non-emergency powered stationary generators starting in 2028. As shown in the air quality analysis provided as Appendix C.1 of this Draft EIR, no non-emergency generators are contemplated for the Project. As such, the Project would not conflict with the objective and policy.
<i>Source: Eyestone Environmental, 2025.</i>	

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, 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 with AQMP control measures.

Thus, the Project would not conflict with or obstruct implementation of the AQMP. With regard to the City's policies, as discussed above, the Project would serve to implement applicable policies of the City pertaining to air quality. Based on the above, impacts related to Threshold (a) would be less than significant.

(2) Mitigation Measures

Project-level impacts related 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): Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

(1) Impact Analysis

(a) Regional Emissions

(i) Construction

Project construction would begin with the demolition of the existing rental car facility structures. The next phase would include grading and excavation. The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2026 and be completed in 2027. For Option 1, 1,460 cubic yards of export would be hauled off the Project Site, and 9,612 cubic yards of import would be hauled to the Project Site. For Option 2, 5,350 cubic yards of export would be hauled off the Project Site, and 485 cubic yards of import would be hauled to the Project Site.

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

The emissions levels in Table IV.B-6 on page IV.B-62 represent the highest daily emissions projected to occur during each year of construction for both Option 1 and Option 2. The calculated emissions in Table IV.B-6 conservatively do not account for the reduction in offroad emissions associated with Project Design Feature AIR-PDF-1 (Tier 4 equipment) but are presented in Appendix C.1 (CalEEMod Output) of this Draft EIR. As presented in Table IV.B-6, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed any SCAQMD daily significance thresholds. Therefore, regional construction emissions resulting from the Project would result in a less-than-significant air quality impact.

(ii) Operation

As discussed above, the Project would develop an industrial center with up to 435,390 square feet of industrial uses on an approximately 18-acre site. The Project includes two options: Option 1 would develop one building comprised of up to 435,390 square feet of floor area, and Option 2 would develop three buildings comprised of up to 410,056 square feet of floor area. SCAQMD's CalEEMod was used to calculate area-, energy-, mobile-, and stationary-source emissions. Please refer to Appendix C.1-1 of this Draft EIR for additional details regarding on-site source (truck travel, TRUs, and yard trucks) emission calculations. The Project would incorporate project design features to support and promote environmental sustainability, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. While these features are designed primarily to reduce GHG emissions, they would also serve to reduce criteria air pollutants discussed herein. For purposes of the air quality analysis, project characteristics incorporated in this analysis include the Project Site's accessibility to transit and increase in diversity of uses and density, which would reduce VMT, in comparison to a Project located in less diverse and dense area. The LADOT VMT Calculator takes into account these features, including proximity to transit and high-density, mixed-use development when calculating Project VMT. These Project characteristics are explained further in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

Table IV.B-7 and Table IV.B-8 on pages Table IV.B-7 and IV.B-65, respectively, provide Project operational emissions with Option 1 and Option 2, respectively. The calculated emissions in Table IV.B-7 and Table IV.B-8 conservatively do not account for the reduction in pollutant emissions associated with Project Design Feature AIR-PDF-2 (future EVSE for tractor trailer parking), AIR-PDF-3 (electrical hook-ups for charging of forklifts), and AIR-PDF-4 (electrical hook-ups for all loading bays). As shown in Table IV.B-7 and Table IV.B-8, regional emissions resulting from operation of the Project would not exceed any SCAQMD's daily regional operational thresholds. Therefore, regional operational emissions resulting from the Project would result in a less-than-significant air quality impact.

Table IV.B-6
Estimate of Maximum Regional Project Daily Construction Emissions (pounds per day)^{a,b}

Construction Year	VOC ^c	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
OPTION 1 (One Building Scenario)						
Winter Regional Construction Emissions						
2026	3	28	45	<1	4	1
2027	27	27	444	<1	4	1
Summer Regional Construction						
2026	4	45	46	<1	15	4
2027	29	46	68	<1	10	3
Maximum Unmitigated Construction Emissions	29	46	68	<1	15	4
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(46)	(54)	(482)	(150)	(135)	(51)
Maximum Unmitigated Construction Emissions Exceed Threshold?	No	No	No	No	No	No
OPTION 2 (Three Building Scenario)						
Winter Regional Construction						
2026	3	28	45	<1	4	1
2027	25	27	44	<1	4	1
Summer Regional Construction						
2026	6	62	66	<1	24	6
2027	28	46	68	<1	10	3
Maximum Unmitigated Construction Emissions	28	62	68	<1	24	6
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(47)	(38)	(482)	(150)	(126)	(49)
Maximum Unmitigated Construction Emissions Exceed Threshold?	No	No	No	No	No	No
<i>Numbers may not add up exactly due to rounding.</i> ^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C.1 (CalEEMod Output) of this Draft EIR. ^b Unmitigated scenario assumes compliance with SCAQMD Rule 403 requirements for fugitive dust. Dust control measures include watering three times daily and properly securing soil exporting loads prior to transport. ^c Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions. Source: Eyestone Environmental, 2025.						

Table IV.B-7
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout
(Option 1)^a

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Existing Winter^b						
Area	1	0	0	0	0	0
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	16	12	122	<1	29	8
Stationary	0	0	0	0	0	0
Total	17	13	122	<1	29	8
Project Winter^c						
Area	11	0	0	0	0	0
Energy (Natural Gas) ^d	0	0	0	0	0	0
Mobile (Passenger Vehicles)	5	3	43	<1	11	3
Mobile (Trucks)	1	37	25	<1	12	4
Mobile (On-Site Forklifts)	<1	16	159	<1	<1	<1
Mobile (On-Site Trucks/TRUs/Yard Trucks)	<1	7	6	<1	<1	<1
Mobile (Total)	7	63	233	<1	23	6
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Total	17	63	235	<1	23	6
Project Less Existing Winter						
Area	9	0	0	0	0	0
Energy (Natural Gas)	(<1)	(<1)	(<1)	(<1)	(<1)	(<1)
Mobile	(10)	51	111	<1	(6)	(1)
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Total Proposed Uses Emissions	(<1)	50	112	<1	(6)	(1)
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(55)	(5)	(438)	(150)	(156)	(56)
Exceed Threshold?	No	No	No	No	No	No
Existing Summer^b						
Area	1	<1	2	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	17	11	131	<1	29	8
Stationary	0	0	0	0	0	0
Total	18	12	133	<1	29	8
Project Summer^c						
Area	14	<1	19	<1	<1	<1
Energy (Natural Gas) ^d	0	0	0	0	0	0
Mobile (Passenger Vehicles)	5	3	47	<1	11	3
Mobile (Trucks)	1	35	27	<1	12	4

Table IV.B-7 (Continued)
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout
(Option 1)

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
<i>Mobile (On-Site Forklifts)</i>	<1	16	159	<1	<1	<1
<i>Mobile (On-Site Trucks/TRUs/Yard Trucks)</i>	<1	7	6	<1	<1	<1
Mobile (Total)	7	61	239	<1	23	6
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Total	21	62	259	<1	23	6
Project Less Existing Summer						
Area	12	<1	17	<1	<1	<1
Energy (Natural Gas)	(<1)	(<1)	(<1)	(<1)	(<1)	(<1)
Mobile	(10)	50	108	<1	(6)	(1)
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Total Proposed Uses Emissions	3	50	126	<1	(6)	(1)
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(52)	(5)	(424)	(150)	(146)	(56)
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 C.1 (CalEEMod Output) of this Draft EIR. ^b Existing emissions estimated for the year of Project buildout (2027). ^c Project emissions conservatively do not include implementation of Project Design Features AIR-PDF-2 through AIR-PDF-4. ^d The Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations. Source: Eyestone Environmental, 2025.						

Table IV.B-8
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout
(Option 2)^a

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Existing Winter^b						
Area	1	0	0	0	0	0
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	16	12	122	<1	29	8
Stationary	0	0	0	0	0	0
Total	17	13	122	<1	29	8
Project Winter^c						
Area	10	0	0	0	0	0
Energy (Natural Gas) ^d	0	0	0	0	0	0
Mobile (Passenger Vehicles)	4	2	33	<1	8	2
Mobile (Trucks)	1	37	25	<1	12	4
Mobile (On-Site Forklifts)	<1	16	159	<1	<1	<1
Mobile (On-Site Trucks/TRUs/Yard Trucks)	<1	7	5	<1	<1	<1
Mobile (Total)	6	62	222	<1	20	6
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Total	16	62	224	<1	20	6
Project Less Existing Winter						
Area	9	0	0	0	0	0
Energy (Natural Gas)	(<1)	(<1)	(<1)	(<1)	(<1)	(<1)
Mobile	(10)	49	100	<1	(9)	(2)
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Total Proposed Uses Emissions	(<1)	49	101	<1	(9)	(2)
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(56)	(6)	(449)	(150)	(159)	(57)
Exceed Threshold?	No	No	No	No	No	No
Existing Summer^b						
Area	1	<1	2	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	17	11	131	<1	29	8
Stationary	0	0	0	0	0	0
Total	18	12	133	<1	29	8
Project Summer^c						
Area	13	<1	18	<1	<1	<1
Energy (Natural Gas) ^d	0	0	0	0	0	0
Mobile (Passenger Vehicles)	4	2	35	<1	8	2
Mobile (Trucks)	1	35	27	<1	12	4

Table IV.B-8 (Continued)
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout
(Option 2)

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
<i>Mobile (Onsite Forklifts)</i>	<1	16	159	<1	<1	<1
<i>Mobile (Onsite Trucks/TRUs/Yard Trucks)</i>	<1	7	5	<1	<1	<1
Mobile (Total)	6	60	226	<1	20	6
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Total	19	60	246	<1	20	6
Project Less Existing Summer						
Area	12	<1	16	<1	<1	<1
Energy (Natural Gas)	(<1)	(<1)	(<1)	(<1)	(<1)	(<1)
Mobile	(10)	49	95	<1	(9)	(2)
Stationary (Emergency Generator)	<1	<1	2	<1	<1	<1
Total Proposed Uses Emissions	1	49	113	<1	(9)	(2)
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(54)	(6)	(437)	(150)	(159)	(57)
Exceed Threshold?	No	No	No	No	No	No
<i>Numbers may not add up exactly due to rounding.</i> ^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C.1 (CalEEMod Output) of this Draft EIR. ^b Existing emissions estimated for the year of Project buildout (2027). ^c Project emissions conservatively do not include implementation of Project Design Features AIR-PDF-2 through AIR-PDF-4. ^d The Project includes Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations. Source: Eyestone Environmental, 2025.						

(b) Localized Emissions

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

(i) Construction

As analyzed in Threshold (c) below and provided in Table IV.B-9 on page IV.B-69 further below, maximum construction emissions would not exceed any SCAQMD-recommended localized thresholds. Therefore, localized construction emissions resulting from the Project would result in a less-than-significant air quality impact.

(ii) Operations

Project-related operational emissions were also evaluated based on SCAQMD LST methodology and dispersion modeling using the USEPA AERMOD model. The SCAQMD LST methodology evaluates emissions from on-site sources (e.g., truck travel and idling, TRUs, yard trucks and an emergency generator). As analyzed in Threshold (c) below and provided in Table IV.B-10 on page IV.B-71 further below, Project-related operational emissions from on-site sources would not exceed localized thresholds. 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 whose air emissions 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, impacts resulting from projects whose air emissions do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.⁸¹ As shown in Table IV.B-6, Table IV.B-7, and Table IV.B-8 on pages IV.B-62, IV.B-63, and IV.B-65, respectively, Project construction and operational daily emissions at the Project Site would not exceed any of SCAQMD's regional thresholds. Similarly, construction and operational emissions from the Project would not exceed any of SCAQMD's localized significance thresholds at Project buildout as shown in Table IV.B-9 and Table IV.B-10 on pages IV.B-69 and IV.B-71, respectively, further below. Thus, construction and operation of the Project would have less-than-significant impacts with regard to regional and localized emissions. **Therefore, the Project's contribution to regional and localized cumulative air quality impacts would not be cumulatively considerable and, thus, would be less than significant. As such, impacts to Threshold (b) would be less than significant.**

(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, and the impact level remains less than significant.

⁸¹ SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003, Appendix D.

Threshold (c): Expose sensitive receptors to substantial pollutant concentrations.**(1) Impact Analysis****(a) Construction****(i) On-Site Construction Activities (Criteria Pollutants)**

The localized construction air quality analysis was conducted using the methodology promulgated by SCAQMD in which dispersion modeling using the USEPA AERMOD model was used to evaluate localized construction impacts.⁸² Localized impacts are determined by adding the contribution to pollutant concentrations from the Project activity to the background concentration and comparing the total concentration to the ambient air quality standards. Although the trend shown in Table IV.B-2 on page IV.B-29 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., 2026–2027). The analysis is based on existing background ambient air quality monitoring data (2021–2023).

Maximum on-site daily construction emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and entered into the AERMOD model to determine pollutant concentrations at nearby receptors. Potential impacts were evaluated at the closest off-site sensitive receptors, which are residences located immediately adjacent to the Project Site to the north, northwest, and west. Other receptors are located to the south and west of the Project site. The maximum pollutant concentrations resulting from Project construction are presented in Table IV.B-9 on page IV.B-69. As shown in Table IV.B-9, maximum construction emissions would not exceed ambient air quality standards. As a result, localized construction emissions resulting from the Project would result in a less-than-significant air quality impact.

(ii) On-Site Construction Activities (Toxic Air Contaminants)

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. “Individual Cancer Risk” is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 17 months, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, SCAQMD CEQA guidance does not require a health risk

⁸² SCAQMD, *LST Methodology Appendix C-Mass Rate LST Look-up Table*, revised October 2009.

Table IV.B-9
Project Estimate of Localized Construction Impacts at Off-Site Receptors (Residential/Sensitive)
($\mu\text{g}/\text{m}^3$)

Pollutant/Averaging Time	Pollutant Concentrations ($\mu\text{g}/\text{m}^3$)				
	Project Contribution	Ambient Concentration ^a	Total	Significance Threshold (Most Stringent AAQS)	Exceed Threshold?
Option 1					
Nitrogen Dioxide (NO_2)^b					
1-hr NO_2	35	118	153	339 (0.18 ppm)	No
1-hr NO_2 —98th percentile	35	89	124	188 (0.10 ppm)	No
Annual NO_2	3	21	24	57 (0.030 ppm)	No
Particulate Matter (PM_{10})^c					
24-hr PM_{10}	2.9	—	2.9	10.4	No
Annual PM_{10}	0.1	—	0.1	1.0	No
Particulate Matter ($\text{PM}_{2.5}$)^c					
24-hr $\text{PM}_{2.5}$	1.0	—	1.0	10.4	No
Carbon Monoxide (CO)					
1-hr CO	116	1,955	2,071	23,000 (20 ppm)	No
8-hr CO	53	1,725	1,778	10,000 (9.0 ppm)	No
Option 2					
Nitrogen Dioxide (NO_2)^b					
1-hr NO_2	42	118	161	339 (0.18 ppm)	No
1-hr NO_2 —98th percentile	42	89	132	188 (0.10 ppm)	No
Annual NO_2	3	21	25	57 (0.030 ppm)	No
Particulate Matter (PM_{10})^c					
24-hr PM_{10}	2.7	—	2.7	10.4	No
Annual PM_{10}	0.1	—	0.1	1.0	No
Particulate Matter ($\text{PM}_{2.5}$)^c					
24-hr $\text{PM}_{2.5}$	1.0	—	1.0	10.4	No
Carbon Monoxide (CO)					
1-hr CO	117	1,955	2,072	23,000 (20 ppm)	No
8-hr CO	54	1,725	1,779	10,000 (9.0 ppm)	No
<i>ppb = parts per billion</i> <i>ppm = parts per million</i> <i>$\mu\text{g}/\text{m}^3$ = microns per square meter</i> <i>Numbers may not add up exactly due to rounding.</i> ^a Ambient concentrations were obtained from the SCAQMD Southwest LA County Monitoring Station for Year 2021 and Northwest Coastal LA County for Years 2022 and 2023. These values represent the maximum concentrations measured during those years. ^b The modeling analysis for NO_2 conservatively assumes 100 percent NO_x to NO_2 conversion. ^c Ambient pollutant concentrations within the South Coast Air Basin currently exceed state and federal PM_{10} and $\text{PM}_{2.5}$ standards. As any PM_{10} or $\text{PM}_{2.5}$ emitting activities would contribute to an exceedance of air quality standards, SCAQMD established an incremental increase of $10.4 \mu\text{g}/\text{m}^3$ threshold for construction activities as the relevant significance threshold. Source: Eyestone Environmental, 2025.					

assessment (HRA) for short-term construction emissions. Therefore, it is not necessary to evaluate long-term cancer impacts from construction activities, which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. As such, 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 substantial sources of air pollution within the Project Site. However, the Project would include 2 diesel-powered yard trucks, an emergency generator, trucks with TRUs, and truck travel, idling and maneuvering on the Project Site. As the Project operational area is larger than five acres, dispersion modeling was performed to determine localized impacts, consistent with SCAQMD LST guidelines. Pollutant concentrations resulting from Project operations are presented in Table IV.B-10 on page IV.B-71. As shown in Table IV.B-10, localized pollutant concentrations resulting from on-site operational emissions would not exceed applicable ambient air quality standards. Therefore, localized on-site operational emissions resulting from the Project would result in a less-than-significant air quality impact.

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

Consistent with the CO methodology above, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. At buildout of the Project, the highest average daily trips at an intersection under the Future With Project Conditions⁸³ would be approximately 62,000 trips at the South Airport Boulevard and West Arbor Vitae Street intersection,⁸⁴ which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.⁸⁵ This daily trip estimate is based on the peak hour conditions of the intersection. There is nothing unique to the Air Basin meteorology to conclude that the CO concentrations at the South Airport Boulevard and West Arbor Vitae Street intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken

⁸³ As defined in the Transportation Assessment, included as Appendix I.1 of this Draft EIR, the Future With Project Conditions is the traffic scenario that provides projected traffic volumes and an assessment of operating conditions under future conditions with the addition of Project-generated traffic.

⁸⁴ Eyestone Environmental, Appendix C.1: Air Quality and GHG Appendix - CO Hotspot Analysis Appendix; Gibson Transportation Consulting, Inc., Transportation Assessment for the 9000 Airport Boulevard Project, Los Angeles, California, October 2025. Included as Appendix I.1 of this Draft EIR.

⁸⁵ 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.

Table IV.B-10
Project Estimate of Localized Operational Impacts at Off-Site Receptors (Residential/Sensitive)
($\mu\text{g}/\text{m}^3$)

Pollutant/Averaging Time	Pollutant Concentrations ($\mu\text{g}/\text{m}^3$)				
	Project Contribution	Ambient Concentration ^a	Total	Significance Threshold (Most Stringent AAQS)	Exceed Threshold?
Option 1					
Nitrogen Dioxide (NO_2)^b					
1-hr NO_2	16	118	134	3(0.18 ppm)	No
1-hr NO_2 —98th percentile	16	89	105	188 (0.10 ppm)	No
Annual NO_2	6	21	27	57(0.030 ppm)	No
Particulate Matter (PM_{10})^c					
24-hr PM_{10}	.5	—	0.5	2.5	No
Annual PM_{10}	0.2	—	0.2	1.0	No
Particulate Matter ($\text{PM}_{2.5}$)^c					
24-hr $\text{PM}_{2.5}$	0.1	—	0.1	2.5	No
Carbon Monoxide (CO)					
1-hr CO	127	1,955	2,082	23,000 (20 ppm)	No
8-hr CO	107	1,725	1,832	10,000 (9.0 ppm)	No
Option 2					
Nitrogen Dioxide (NO_2)^b					
1-hr NO_2	16	118	134	339 (0.18 ppm)	No
1-hr NO_2 —98th percentile	16	89	105	188 (0.18 ppm)	No
Annual NO_2	6	21	27	57 (0.030 ppm)	No
Particulate Matter (PM_{10})^c					
24-hr PM_{10}	0.5	—	0.5	2.5	No
Annual PM_{10}	0.2	—	0.2	1.0	No
Particulate Matter ($\text{PM}_{2.5}$)^c					
24-hr $\text{PM}_{2.5}$	0.1	—	0.1	2.5	No
Carbon Monoxide (CO)					
1-hr CO	126	1,955	2,081	23,000 (20 ppm)	No
8-hr CO	105	1,725	1,830	10,000 (9.0 ppm)	No
<i>ppb = parts per billion</i> <i>ppm = parts per million</i> <i>$\mu\text{g}/\text{m}^3$ = microns per square meter</i> <i>Numbers may not add up exactly due to rounding.</i> ^a Ambient concentrations were obtained from the SCAQMD Southwest LA County Monitoring Station for Year 2021 and Northwest Coastal LA County for Years 2022 and 2023. These values represent the maximum concentrations measured during those years. ^b The modeling analysis for NO_2 conservatively assumes 100% NO_x to NO_2 conversion. ^c Ambient pollutant concentrations within the South Coast Air Basin currently exceed state and federal PM_{10} and $\text{PM}_{2.5}$ standards. As any PM_{10} or $\text{PM}_{2.5}$ emitting activities would contribute to an exceedance of air quality standards, SCAQMD established an incremental increase of 2.5 $\mu\text{g}/\text{m}^3$ threshold for operational activities as the relevant significance threshold. Source: Eyestone Environmental, 2025.					

for the 2003 AQMP⁸⁶ and discussed above. 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. As a result, impacts related to localized mobile-source CO emissions are less than significant. The supporting data for this analysis are included in Appendix C.1 of this Draft EIR.

(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. For warehouse and distribution centers, SCAQMD recommends a 1,000-foot separation distance between the sensitive receptor and a source that accommodates more than 100 trucks per day or 40 trucks with TRUs.⁸⁷ SCAQMD recommends that HRAs be conducted for projects that result in substantial individual sources of DPM (e.g., warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating TRUs) and has provided guidance for analyzing mobile source diesel emissions.⁸⁸ The Project is conservatively estimated to generate approximately 585 truck trips per day during operation of Option 1 and 527 truck trips for Option 2. The Project would also include up to 10,000 square feet of refrigerated warehousing space, and approximately eight of the trucks per day would be equipped with TRUs. As such, a detailed HRA was performed for the Project (Appendix C.2) to further evaluate potential health risk impacts.

The primary sources of potential air toxics associated with Project operations include 2 diesel-powered yard trucks, an emergency generator, trucks with TRUs, and truck travel, idling and maneuvering on the Project Site. The results from the health risk calculations provide an estimate of the potential risks and hazards to individuals through inhalation of Project operational DPM emissions. The HRA conservatively does not account for the reduction in TAC emissions associated with the removal of existing uses (e.g. maintenance activities, fueling station, bus and vehicle travel, idling, and maneuvering on the Project Site). Consistent with OEHHA guidelines, health risk impacts from Project operational DPM emissions were assessed over a 30-year exposure duration for residential receptors. The estimated risks and hazards include lifetime excess cancer risk estimates and cumulative chronic hazard index (HI) estimates for the receptor locations of concern.

⁸⁶ *It should be noted that CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP. In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2014.*

⁸⁷ *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005)*

⁸⁸ *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.*

As shown in Appendix C.1 of this Draft EIR, Option 1 and Option 2 yield a maximum off-site individual cancer risk of 8.3 in a million and 5.6 in a million, respectively, for residential uses located directly east of the Project Site. The maximum cancer burden of 0.02 under Option 1 and 0.03 under Option 2 would both be less than the SCAQMD significance threshold of 0.5 excess cancer cases, as presented in Table IV.B-4 on page IV.B-37. The maximum chronic risk of 0.001 under Option 1 and 0.002 under Option 2 both occur within this same residential receptor area. As the Project operations would not emit carcinogenic contaminants or TACs that result in impacts which exceed the maximum individual cancer risk of 10 in one million or the cancer burden of or the chronic index of 1.0, Project-related TAC impacts would be less than significant. As such, the Project would not release substantial amounts of TACs, and impacts on human health related to the exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

As discussed above, AB 98 mandates several environmental and community health protections related to TACs and “logistics use.” However, AB 98 does not apply to “logistics use” projects that commenced the local entitlement process prior to September 30, 2024, as long as development activity has commenced within five years of securing entitlement approvals or to mixed-use developments that may create sensitive receptors on the site of a new logistics use, provided there are no existing sensitive receptors within 900 feet of a loading bay. Accordingly, as the subject case was deemed complete on August 21, 2024, the Project is not subject to the requirements of AB 98.⁸⁹ However, although the Project is not required to incorporate AB 98’s environmental and community health protections related to TACs and logistics use in the design of the Project, many are included as Project Design Features.

Consistent with AB 98, the Project would orient loading bays on the opposite side of the building from sensitive receptors, substantially separate entrances for heavy-duty trucks, and locate the truck entrances/exits and internal circulation away from sensitive receptors. While the loading bays would not be set back 300 feet from a property line abutting a sensitive receptor, the HRA demonstrates that health risk impacts would be less than significant. The Project also would incorporate many of the Tier 1 21st Century Warehouse design elements, including the following:

- Requirements of the most current building energy efficiency standards of Title 24, including the CALGreen Code.
- Project Design Feature GHG-PDF-2 for installation of a photovoltaic system;
- Cool roofing;

⁸⁹ The entitlement application for the Project was filed on October 10, 2023.

- Project Design Feature AIR-PDF-4 for the installation of infrastructure for medium- and heavy-duty vehicle charging readiness;
- CALGreen Code and City requirements for light-duty electric vehicle charging readiness and installed charging stations.
- Skylights in at least 1 percent of the roof area or equivalent LED efficient lighting.
- Project Design Feature AIR-PDF-3 for the installation of electrical outlets for charging electrical forklifts.
- Project Design Feature AIR-PDF-4 for the installation of electrical hookups at all loading bays.
- Installation of heating, ventilation, and air-conditioning (HVAC) units that are high-efficiency consistent with the equivalent of LEED Gold.

As the Project would not result in the exposure of off-site sensitive receptors to carcinogenic contaminants or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, potential TAC impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to Threshold (c) during 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 (d): Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

As evaluated in the Initial Study prepared for this Project, included in Appendix A of this Draft EIR, no objectionable odors are anticipated to adversely affect a substantial number of people as a result of either construction or operation of the Project. **Therefore, as determined in the Initial Study, the potential odor impact during construction and operation of the Project would be less than significant, and no further analysis is required.**

e. Cumulative Impacts

(1) Impact Analysis

As discussed above, the Project's construction and operational-related regional air quality emissions, localized emissions, and emissions of TACs would be less than significant. Based on SCAQMD guidance, individual construction 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.⁹⁰ However, those projects that do not exceed the thresholds would not be cumulatively considerable. Therefore, since the Project would not exceed the threshold for air pollutant emissions, the Project's contribution to cumulative air quality impacts would not be cumulatively considerable. **Accordingly, cumulative impacts related to air quality would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to air quality 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 and cumulative construction and operational air quality impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

⁹⁰ SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, August 2003.*