

IV. Environmental Impact Analysis

IV. Environmental Impact Analysis

A. Air Quality

1. Introduction

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Project and evaluates whether Project emissions would conflict with or obstruct implementation of the applicable air quality plan; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. This section relies on information included in the *3822 Figueroa Project Air Quality Assessment* (Air Quality Assessment), provided in Appendix B of this Draft EIR.

2. Environmental Setting

a. Air Quality Background

(1) Air Quality and Public Health

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and to facilitate improvement in air quality. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations, such as asthmatics, children, and the elderly with a margin of safety, and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.¹ As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. New findings over time have, in turn, led to the revision and lowering of NAAQS which, in the judgment of the U.S. Environmental Protection Agency (USEPA), are necessary to protect public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to the NAAQS.² The NAAQS and CAAQS are listed in **Table IV.A-1: Ambient Air Quality Standards**, on page IV.A-9.

¹ USEPA, NAAQS Table, <https://www.epa.gov/criteria-air-pollutants/naaqs-table>, accessed August 2025.

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

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

To meet the air quality standards, regional plans are developed, including the SCAQMD Air Quality Management Plan (AQMP), which incorporates regional demographic projections and integrated regional land use and transportation strategies from 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.

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

³ SCAQMD, *Map of Jurisdiction*, 1999.

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 (O₃), respirable and fine particulate matter (PM₁₀ and PM_{2.5}, respectively), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). These pollutants are referred to as “criteria air pollutants” or “criteria pollutants” as a result of the specific standards, or criteria, which have been adopted for them.

(i) *Ozone (O₃)*

O₃ 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. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O₃ 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 (PM₁₀ 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, PM₁₀ 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 PM₁₀ 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)*

Nitrogen dioxide 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 burning 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 cardiopulmonary 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

⁴ California Air Resources Board (CARB), Hydrogen Sulfide & Health, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>, accessed August 2025.

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

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

Although the SCAQMD's primary mandate is attaining the NAAQS and the CAAQS for criteria pollutants within the district, SCAQMD also has a general responsibility to control emissions of air contaminants and prevent endangerment to public health. As a result, the SCAQMD has regulated pollutants other than criteria pollutants, such as VOCs, TACs, greenhouse gases (GHGs), and stratospheric O₃-depleting compounds.

⁵ CARB, Hydrogen Sulfide & Health, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>, accessed August 2025.

⁶ CARB, Hydrogen Sulfide & Health, <https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health>, accessed August 2025.

⁷ CARB, Visibility-Reducing Particles and Health, <https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health>, accessed August 2025.

⁸ CARB, Visibility-Reducing Particles and Health, <https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health>, accessed August 2025.

⁹ CARB, Vinyl Chloride & Health, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>, accessed August 2025.

¹⁰ CARB, Vinyl Chloride & Health, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>, accessed August 2025.

¹¹ CARB, Vinyl Chloride & Health, <https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health>, accessed August 2025.

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 the 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 (e.g., chemically formulated products used by household and institutional consumers, architectural coatings, etc.).

TACs

TACs is a term used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness, or which may pose a present or potential hazard to human health and include both carcinogens and non-carcinogens. The California Air Resources Board (CARB) and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or “listed,” as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the USEPA, which are identified on the California Air Toxics Program’s TAC List. TACs are also not classified as “criteria” air pollutants. The greatest potential for TAC emissions during construction is related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy-duty diesel-fueled delivery trucks and stationary emergency generators. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently, ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

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 (2024)
- South Coast Air Quality Management District
 - Air Quality Management Plan

- Air Quality Guidance Documents
- Rules and Regulations
- Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles Air Quality Element
- City of Los Angeles Plan for a Healthy Los Angeles

(1) Federal

(a) *Federal Clean Air Act*

The federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the latest amendments occurring in 1990.¹² The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.¹³ The USEPA is responsible for the implementation and enforcement of the CAA, which establishes the NAAQS, specifies future dates for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).¹⁴

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. **Table IV.A-1** shows the NAAQS currently in effect for each criteria pollutant. 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 include on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_x emissions have been lowered substantially, and the specification requirements for cleaner-burning gasoline are more stringent.

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

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

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

¹⁴ USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, last updated May 2, 2023, www.epa.gov/clean-air-act-overview/clean-air-act-text, accessed August 2025. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.

Table IV.A-1: Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard ^{a,b}	California Standard ^{a,b}	South Coast Air Basin Attainment Status ^c	
				Federal Standard ^d	California Standard ^d
Ozone (O ₃)	1-Hour	--	0.09 ppm (180 µg/m ³)	--	Non-Attainment
	8-Hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM ₁₀)	24-Hour	150 µg/m ³	50 µg/m ³	Attainment	Non-Attainment
	Annual	--	20 µg/m ³		
Fine Particulate Matter (PM _{2.5})	24-Hour	35 µg/m ³	--	Non-Attainment (Serious)	Non-Attainment
	Annual	9 µg/m ³	12 µg/m ³		
Carbon Monoxide (CO)	1-Hour	35 ppm (40 mg/m ³)	20 ppm (23 mg/m ³)	Attainment	Attainment
	8-Hour	9 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)		
Nitrogen Dioxide (NO ₂)	1-Hour	0.10 ppm (188 µg/m ³)	0.18 ppm (339 µg/m ³)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m ³)	0.030 ppm (57 µg/m ³)		
Sulfur Dioxide (SO ₂)	1-Hour	0.075 ppm (196 µg/m ³)	0.25 ppm (655 µg/m ³)	Unclassified/ Attainment	Attainment
	24-Hour	0.14 ppm (365 µg/m ³)	0.04 ppm (105 µg/m ³)		
	Annual	0.03 ppm (80 µg/m ³)	--		
Lead (Pb)	30-Day Average	--	1.5 µg/m ³	Partial Non- Attainment ^e	Attainment
	Rolling 3-Month Average	0.15 µg/m ³	--		
Sulfates	24-Hour	--	25 µg/m ³ --	--	Attainment
Hydrogen Sulfide (H ₂ S)	1-Hour	--	0.03 ppm (42 µg/m ³)--	--	Unclassified

ppm = parts per million by volume
µg/m³ = micrograms per cubic meter
mg/m³ = milligrams per cubic meter

^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 equaled or exceeded.

^b Ambient Air Quality Standards based on the 2022AQMP.

^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.
California and federal standard attainment status based on SCAQMD's 2022 AQMP and 2022 updates from CARB.
<https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>.

^e An attainment re-designation request is pending.

Source: South Coast Air Quality Management District, Final 2022 AQMP, December 2022.

(2) State

(a) California Clean Air Act

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

(b) California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operations 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 *Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

(3) Regional

SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the South Coast Air Basin. The Air Basin is a subregion within the western portion of the SCAQMD 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 emissions¹⁵ sufficiently to meet the upcoming 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.¹⁶ 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.¹⁷

SCAQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emission reductions across federal, state, and local levels and industries. The 2022 AQMP is

¹⁵ NO_x emissions are a precursor to the formation of both O₃ and secondary PM_{2.5}.

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

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

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 the CARB and USEPA.

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

The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG.¹⁹ The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on the SCAG's 2020-2045 RTP/SCS.

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

On April 4, 2024, SCAG adopted the 2024-2050 RTP/SCS and CARB accepted SCAG's determination that the 2024-2050 RTP/SCS meets the state's greenhouse gas emission reduction targets in May 2025.²¹ 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

¹⁸ SCAG, Final 2020-2045 RTP/SCS, September 3, 2020.

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

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

²¹ SCAG, California Air Resources Board Accepts SCAG's Sustainable Communities Strategy, 2025, <https://scag.ca.gov/news/california-air-resource-board-accepts-scags-sustainable-communities-strategy>, accessed September 2025.

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.

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

(b) SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the SCAQMD's Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.²² The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses. However, the SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*. While this process is underway, the SCAQMD has provided supplemental guidance on the SCAQMD website to be used in conjunction with the Handbook.²³

The SCAQMD has also adopted land use planning guidelines in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.²⁴ SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The SCAQMD has published a guidance document called the *Final Localized Significance Threshold Methodology* for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction or operation of a project.²⁵ The SCAQMD adopted additional guidance regarding PM_{2.5} emissions in a document called *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds*.²⁶ The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

²² SCAQMD, *CEQA Air Quality Handbook*, April 1993.

²³ SCAQMD, *Air Quality Analysis Handbook*, 1993, [http://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 August 2025.

²⁴ SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005.

²⁵ SCAQMD, *Final Localized Significance Threshold Methodology*, June 2003 (revised July 2008).

²⁶ SCAQMD, *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds*, October 2006.

(c) *SCAQMD Rules and Regulations*

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

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

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

- **Rule 1186 – PM₁₀ Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM₁₀ emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

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

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

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

(4) Local

(a) *City of Los Angeles General Plan*

(i) *Air Quality Element*

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. In general, the City of Los Angeles' General Plan (including the Framework Element, Air Quality Element, Transportation Element, and Health and Wellness Element) 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-occupancy vehicle trips, managing traffic congestion during peak-hours, and increasing energy efficiency in City facilities and private developments.

The Air Quality Element establishes six goals:

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

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

(i) Health and Wellness Element (Plan for a Healthy Los Angeles)

The Health and Wellness Element, Plan for a Healthy Los Angeles, was adopted by the City Council on March 31, 2015 and amended in November 2021 and 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 that leads to mild climate, moderated by cool sea breezes. The usually mild climatological pattern is interrupted by periods of extremely hot weather, winter storms, or Santa Ana winds. The area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle) play a major role in extent and severity of the air pollution problem in the Air Basin where factors, such as wind, sunlight, temperature, humidity, rainfall, and topography affect the accumulation and dispersion of air pollutants throughout the Air Basin, making it an area of high pollution potential.

The greatest air pollution throughout the Air Basin occurs from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. 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 pollutant 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 stations within the Air Basin have demonstrated an exceedance for Pb of the national standard, and an attainment redesignation for Pb is currently pending with the USEPA.

SCAQMD has the responsibility for ensuring that all national and state ambient air quality standards are achieved and maintained throughout the Air Basin. To meet the standards, SCAQMD has adopted a series of AQMPs. The 2022 AQMP includes strategies to ensure that rapidly approaching attainment deadlines are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_x emissions²⁷ 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 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 of reductions from the baseline year of 2018 in the year 2037, is necessary to attain the 8-hour O₃ standard.^{28, 29}

²⁷ NO_x emissions are a precursor to the formation of both O₃ and secondary PM_{2.5}.

²⁸ 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).

²⁹ SCAQMD, 2022 AQMP, 2022 (p. ES-4 2022 AQMP).

The overall control strategy is an integral approach relying on fair-share emission reductions from federal, state, and local levels. The AQMP is composed of stationary and mobile source emission reduction strategies from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with CARB and USEPA. In addition, SCAG's 2020-2045 RTP/SCS³⁰ includes transportation programs, measures, and strategies generally designed to reduce VMT, which are contained in the AQMP.

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

Despite past regional growth, air quality within the 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.A-1, 2022 AQMP Ozone Trends**, shows the percent change in air quality along with demographic data for the four-county region from the 2022 AQMP. In particular, the graphic illustrates the trends since 1995 of the 8-hour O₃ levels, the 1-hour O₃ levels, and annual average PM_{2.5} concentrations (since 2001), compared to the regional gross domestic product, total employment, and population. Human activity in the region has an impact on achieving reductions in emissions. However, the O₃ and particulate matter 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.³¹

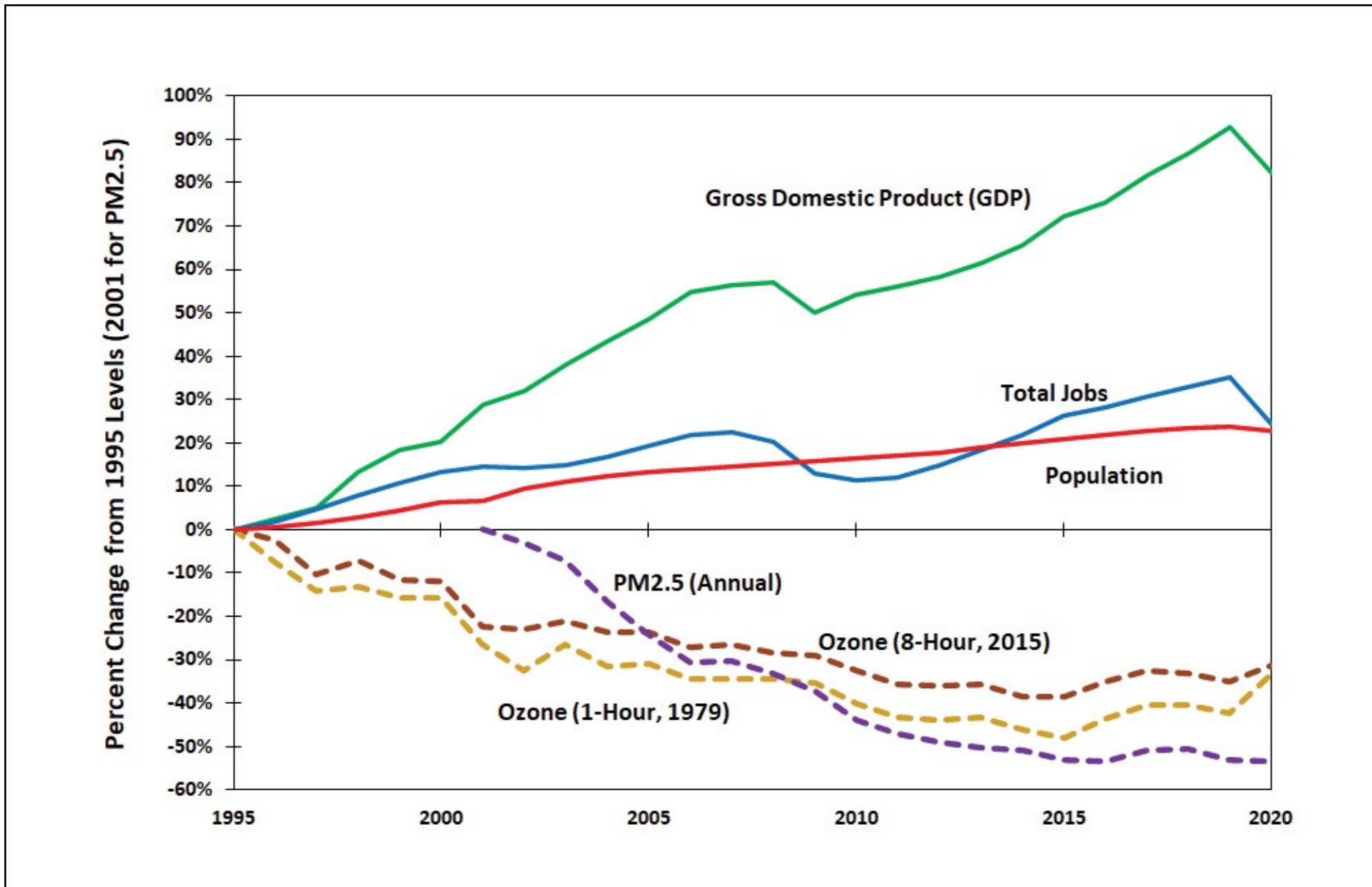
SCAQMD has released the Multiple Air Toxics Exposure Study (MATES-V).³² The MATES-V Study was aimed at estimating the cancer risk from toxic air emissions throughout the Air Basin by conducting a comprehensive monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to fully characterize health risks for those living in the Air Basin. The MATES-V Study concluded that the average carcinogenic risk from air pollution in the Air Basin is approximately 424 in one million over a 70-year duration. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 50 percent of the risk is attributed to diesel particulate emissions, approximately 25 percent to other toxics associated with mobile sources (including benzene, butadiene, and carbonyls), and approximately 25 percent of all carcinogenic risk is attributed to stationary sources (which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses, such as gas stations and chrome plating).³³

³⁰ SCAG, Final 2020 RTP/SCS, September 2020.

³¹ SCAQMD, Final 2022 AQMP, 2022, p. 1-9.

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

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



SOURCE: AQMD, 2022

FIGURE IV.A-1: 2022 AQMP Ozone Trends

3822 SOUTH FIGUEROA PROJECT

SCAQMD has released the Multiple Air Toxics Exposure Study (MATES-V).³⁴ The MATES-V Study was aimed at estimating the cancer risk from toxic air emissions throughout the Air Basin by conducting a comprehensive monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to fully characterize health risks for those living in the Air Basin. The MATES-V Study concluded that the average carcinogenic risk from air pollution in the Air Basin is approximately 424 in one million over a 70-year duration. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 50 percent of the risk is attributed to diesel particulate emissions, approximately 25 percent to other toxics associated with mobile sources (including benzene, butadiene, and carbonyls), and approximately 25 percent of all carcinogenic risk is attributed to stationary sources (which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses, such as gas stations and chrome plating).³⁵

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 Site. 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.³⁶ Risk from less urbanized areas of the Air Basin range from less than 100 to 400 cancers per million. Generally, the risk from air toxins is lower near the coastline and higher risks are concentrated near large diesel sources (e.g., freeways, airports, and ports).

(2) Local Air Quality

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

(a) Existing Pollutant Levels at Nearby Monitoring Stations

CARB monitors ambient air quality at approximately 250 air monitoring stations across the State. These stations usually measure pollutant concentrations ten feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. Existing levels of ambient air quality, historical trends, and projections near the Project Site are documented by measurements made by the SCAQMD, which maintains the 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. The Project Site is located within SRA 1, which covers the Central Los Angeles area.

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) Final Report, August 2021.

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

The closest air monitoring station to the Project Site that monitors ambient concentrations of O₃, CO, NO₂, PM₁₀ and PM_{2.5} is the Los Angeles-North Main Street station (located at 1630 North Main Street, approximately five miles northeast of the Project Site). Local air quality data from 2022 to 2024 (the latest currently available) are provided in **Table IV.A-2, Summary of Ambient Air Quality in the Project Vicinity**, which lists the monitored maximum concentrations and number of exceedances of state or federal air quality standards for each year.

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

Criteria Pollutant	2022	2023	2024
Ozone (O₃)			
Maximum 1-hour Concentration (ppm)	0.138	0.097	0.107
Maximum 8-hour Concentration (ppm)	0.090	0.082	0.081
Days exceeding CAAQS (0.09 ppm)	1	1	2
Days exceeding NAAQS (0.070 ppm)	6	7	6
Carbon Monoxide (CO)²			
Maximum 1-hour Concentration (ppm)	1.7	1.4	1.8
Days exceeding NAAQS (35 ppm)	--	--	--
Days exceeding CAAQS (20 ppm)	--	--	--
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.08	0.06	0.08
Days exceeding NAAQS (100 ppm)	--	--	--
Days exceeding CAAQS (0.18 ppm)	--	--	--
Sulfur Dioxide (SO₂)			
Maximum 1-hour Concentration (ppm)	0.0065	0.0077	0.0023
99 th Percentile 1-hour Concentration (ppm)	0.0023	0.0020	0.0018
Days exceeding NAAQS (0.075 ppm)	--	--	--
Days exceeding CAAQS (0.25 ppm)	--	--	--
Respirable Particulate Matter (PM₁₀)			
Maximum 24-hour Concentration	60	57	77
Annual Average Concentration	28.9	24.3	25.4
Days exceeding NAAQS (150 µg/m ³)	--	--	--
Days exceeding CAAQS (50 µg/m ³)	4	2	10
Fine Particulate Matter (PM_{2.5})			
Maximum 24-hour Concentration	33.7	30.6	55.7
Days exceeding NAAQS 24-hour (35 µg/m ³)	--	--	5
Lead (Pb)			
Maximum Monthly Average Concentration (µg/m ³)	0.008	0.007	0.008
Maximum 3-Month Rolling Average Concentration (µg/m ³)	0.007	0.007	0.008
Days exceeding NAAQS (1.5 µg/m ³)	--	--	--
Days exceeding CAAQS (1.5 µg/m ³)	--	--	--
Sulfate (SO₄)			
Maximum 24-hour Concentration (µg/m ³)	5.8	6.5	14.1
Days exceeding CAAQS (25 µg/m ³)	--	--	--
NAAQS = National Ambient Air Quality Standards CAAQS = California Ambient Air Quality Standards ppm = parts per million; µg/m ³ = micrograms per cubic meter			
^a Measurements taken at the Los Angeles-North Main Street Monitoring Station at 1630 North Main Street, Los Angeles, California 90012 (CARB #70087). Source: SCAQMD, Historical Data by Year, https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year , accessed August 2025.			

(b) Existing Health Risk in the Surrounding Area

As shown in **Figure IV.A-2, MATES V Total Cancer Risk for Project Area**, based on the MATES-V model, the calculated cancer risk in the Project area is approximately 548 in one million.³⁷ The cancer risk in the Project area is predominantly related to nearby sources of diesel particulate (e.g., Interstate 110 [I-110]). In general, the risk at the Project Site is comparable with other freeway-adjacent sites in Los Angeles, which have a similar calculated cancer risk as the Project Site.

Potential sources of TACs within the Project Site vicinity were identified using SCAQMD's Facility Information Database (FIND) search and site reconnaissance to identify potential non-permitted air toxic emitting sources (e.g., freeways, diesel trucks idling at warehouse distribution facilities in excess of 100 trucks per day).³⁸ As discussed above, I-110 is located approximately 100 feet east of the Project Site. Based on the FIND search conducted, no other major sources of TACs are located within a 0.25-mile radius of the Project Site. Minor emissions sources such as boilers or emergency generators are located within the Project vicinity, but no substantial permitted stationary sources (e.g., gasoline stations, dry cleaners, chrome plating operations) of TAC emissions within the Project Site vicinity were identified. The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool (CalEnviroScreen) that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site is located in the 96th percentile, which means that the Project Site is worse than average in terms of pollution in comparison to other communities within California.³⁹

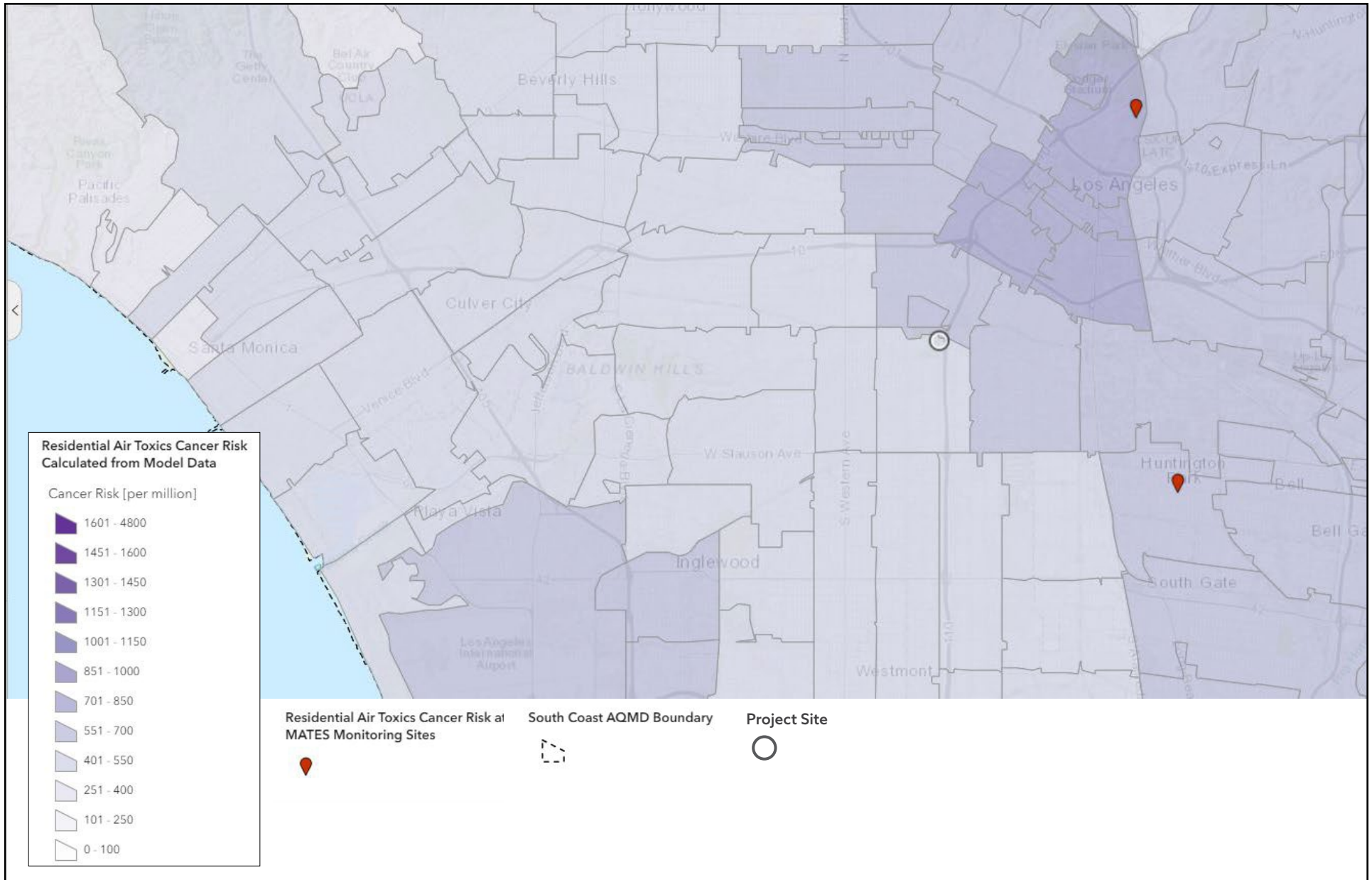
(c) Surrounding Uses

The area surrounding the Project Site is urbanized and includes a mix of low- to mid-rise buildings containing a variety of commercial, residential and public facilities uses. Bordering the Project Site to the south along South Figueroa Street, are two, two-story multi-family units, a parking lot, and commercial uses (currently an auto servicing center). Further south is the mixed-use 3900 South Figueroa Street mixed-use project which is currently under construction. The western portion of the Project Site along South Figueroa Street is bordered to the north by the seven-story "Hub Los Angeles Coliseum," a private student housing development that includes ground floor retail, multi-family units, and various residential amenities.

³⁷ SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Cancer-Risk%2CClick-tabs-for-other-data#data_s=id%3AdataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A35, accessed August 2025.

³⁸ SCAQMD, Facility Information Detail (F.I.N.D.), www.aqmd.gov/nav/FIND, accessed August 2025.

³⁹ OEHHA, CalEnviroScreen 4.0 MAP, https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/, accessed August 2025.



SOURCE: South Coast AQMD, 2021



FIGURE IV.A-2: MATES V Total Cancer Risk for Project Area

3822 SOUTH FIGUEROA PROJECT

Exposition Park is located west of the Project Site. Exposition Park includes the Los Angeles Memorial Coliseum, the recently constructed BMO Stadium which houses the Los Angeles Football Club and Angel City Football Club, the California Science Center, the Dr. Theodore T. Alexander Jr. Science Center School, the California African American Museum, the Los Angeles County Natural History Museum, the Exposition Park Rose Garden, Lucas Museum of Narrative Art (under construction), Wallis Annenberg Building, and the Expo Center.

To the north of the Project Site across West 38th Street are commercial and residential developments including the University of Southern California's (USC) University Park Campus and Garrett Gardens apartment complex. To the east of the Project Site across Flower Drive is the I-110 freeway.

(d) Sensitive Uses

Some population groups, including children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to air pollution than others. Sensitive land uses in the Project vicinity include residential uses to the north, west, and south, Exposition Park to the east, the Alexander Science Center School to the northwest, and University of Southern California to the northwest (shown in **Figure IV.A-3, Air Quality Sensitive Receptors**). All other air quality sensitive receptors are located at greater distances from the Project Site and would be less impacted by Project emissions.

(e) Existing Project Site Emissions

The Project Site is developed with seven two-story apartments along Flower Drive and one two-story apartment and a surface parking lot along South Figueroa Street. The proposed Project would demolish the seven existing two-story apartments along Flower Drive and one two-story apartment and surface parking along Figueroa Street to develop a seven-story, multi-family development with 209 residential units, which would include 42 affordable units, with four units for Extremely Low Income households, 22 units for Very Low Income households, and 16 units for Low Income Households. Therefore, existing operational criteria pollutant emissions would cease. However, to provide a conservative estimate of proposed Project emissions, credit from existing operational emissions has not been accounted for. Because the analysis below does not account for existing operational emissions that will cease during Project operations, the total net level of air quality emissions during Project operations will be lower than the amount indicated herein.



SOURCE: Nearmap, 2024



FIGURE IV.A-3: Air Quality Sensitive Receptors

3822 SOUTH FIGUEROA PROJECT

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

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

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

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

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

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

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

(2) 2006 L.A. CEQA Thresholds Guide

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

(a) Construction

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.

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.

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.

Other Mobile Source Emissions

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

(b) Operation

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

Pollutant	Significance Threshold (lbs/day)
ROG	55
NO _x	55
CO	550
PM ₁₀	150
SO _x	150

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

(i) Toxic Air Contaminants

The determination of significance shall be made on a case-by-case basis, considering the following factors:

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

(3) SCAQMD's CEQA Air Quality Handbook

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

(a) Construction

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

- Emissions from the Project's direct and indirect sources would exceed any of the SCAQMD significance threshold levels identified in **Table IV.A-3**.
- 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) pursuant to SCAQMD LST methodology.⁴¹
- 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-hr threshold of 10.4 µg/m³ or 1.3 µg/m³ PM₁₀ averaged over an annual period pursuant to SCAQMD LST methodology.⁴²

(b) Operation

Based on the criteria set forth in SCAQMD's CEQA Air Quality Handbook,⁴³ the Project would have a significant impact if the Project's operational estimated emissions would cause any of the following to occur:

- Regional emissions from the Project's direct and indirect sources exceed any of the SCAQMD significance thresholds levels identified in **Table IV.A-3**.
- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO₂ (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average

⁴⁰ SCAQMD, CEQA Air Quality Handbook, 1993.

⁴¹ SCAQMD, LST Methodology, June 2023, revised 2008.

⁴² SCAQMD, LST Methodology, June 2023, revised 2008.

⁴³ SCAQMD, CEQA Air Quality Handbook, 1993.

of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period) pursuant to SCAQMD LST methodology.⁴⁴

- Maximum on-site localized operation PM10 and PM2.5 emissions exceed the incremental 24-hr threshold of 2.5 µg/m³ or 1.0 µg/m³ PM10 averaged over an annual period.⁴⁵
- 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).

Table IV.A-3: SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds^a		
Pollutant	Construction ^b	Operation
NO _x	100 lbs/day	55 lbs/day
VOC ^c	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead ^d	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants^e		
NO ₂ 1-hour average Annual Arithmetic Mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM ₁₀ 24-hour average Annual Average	10.4 µg/m ³ (construction) ^f & 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)	
SO ₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal)	
lbs/day = pounds per day		
^a SCAQMD CEQA Handbook (SCAQMD, 1993), Page 6-2 and 6-3.		

⁴⁴ SCAQMD, LST Methodology, June 2003, revised 2008.

⁴⁵ SCAQMD, Final Methodology to Calculate PM2.5 and PM2.5 Significance Thresholds, October 2006.

Table IV.A-3: SCAQMD Air Quality Significance Thresholds

<p>^b Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).</p> <p>^c Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic gases (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.</p> <p>^d While the South Coast Air Quality Management District CEQA Air Quality Handbook contains significance thresholds for Pb, Project construction and operation would not include sources of Pb emissions and would not exceed the significance thresholds for Pb. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial land use projects, such as the Project. As a result, Pb emissions are not further evaluated in this Draft EIR.</p> <p>^e Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.</p> <p>^f Ambient air quality threshold based on South Coast AQMD Rule 403.</p> <p>Source: South Coast Air Quality Management District, 2023.</p>

(i) *Toxic Air Contaminants*

Based on the criteria set forth in SCAQMD's CEQA Air Quality Handbook, the Project would have a significant toxic air contaminant impact, if:⁴⁶

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

(ii) *Consistency with Applicable Air Quality Plans*

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with SCAQMD's CEQA Air Quality Handbook,⁴⁷ the following criteria are used to evaluate the Project's consistency with SCAQMD's AQMP:

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

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

⁴⁶ SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a project) and Chapter 10 (Assessing Toxic Air Pollutants), April 1993.

⁴⁷ SCAQMD, CEQA Air Quality Handbook, 1993.

(c) 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. 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.⁴⁸

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

b. Methodology

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

Although 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.⁴⁹

In order to assist the CEQA practitioner in conducting an air quality analysis in the interim while the replacement Air Quality Analysis Guidance Handbook is being prepared, supplemental guidance/information is provided on the SCAQMD website and includes: (1) EMFAC on-road vehicle emission factors; (2) background CO concentrations; (3) localized significance thresholds; (4) mitigation measures and control efficiencies; (5) mobile source toxics analysis; (6) off-road mobile source emission factors; (7) PM_{2.5} significance thresholds and calculation methodology;

⁴⁸ SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003, Appendix D.

⁴⁹ SCAQMD, Air Quality Analysis Handbook, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>, accessed August 2025.

and (8) updated SCAQMD Air Quality Significance Thresholds.⁵⁰ SCAQMD also recommends using approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod). These recommendations were followed in the preparation of this analysis.

(1) Construction

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

(a) Regional Emissions

The Project's "regional" emissions refer to emissions that will be evaluated based on regional significance thresholds established by 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 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 model⁵¹ (OFFROAD) and Emission FACTor model⁵² (EMFAC), which are emissions estimation models developed by CARB, and used to calculate emissions from construction activities, including off- and on-road vehicles, respectively. CalEEMod also relies upon known emissions data associated with certain activities or equipment (often referred to as "default" data, values, or factors) that can be used if site-specific information is not available. CalEEMod contains default values to use in each specific local air district region. Appropriate statewide default values can be used, if regional default values are not defined. The input values used in this analysis were adjusted to be Project-specific based on the construction schedule. These volumes were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions

⁵⁰ SCAQMD, Air Quality Analysis Handbook, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>, accessed August 2025.

⁵¹ CARB, 2021 Off-Road Diesel Emission Factors, <https://arb.ca.gov/emfac/offroad/emissions-inventory/735798912e685138eebafa89b51d35dbbd690c1a>, accessed August 2025.

⁵² CARB, EMFAC 2021, Onroad Emissions, <https://arb.ca.gov/emfac/emissions-inventory/61ef289e927b79fc%20507d282ca9b8db79e44c93e7>, accessed August 2025.

values for each construction activity. Construction tasks were aggregated to reflect overlapping tasks and identify the reasonably expected maximum construction emissions occurring over the course of Project construction. To be conservative, this analysis evaluates the Project's air quality impacts during construction based on reasonably expected maximum construction emissions even though such emissions would not occur throughout the entire construction phase. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in Appendix B of this Draft EIR.

(i) *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.⁵³ SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}.⁵⁴ 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.

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

(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 three types of sources: (1) area, (2) energy, (3) and mobile. Area source emissions are generated by, among other things, landscape equipment, and the use of consumer products. Energy source emissions are generated as a result of activities in buildings for which natural gas is used (e.g., natural gas for cooking in commercial kitchens). Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of the Project.

Criteria pollutants are emitted during the generation of electricity at fossil fuel power plants. When electricity is used in buildings, the electricity generation typically takes place at off-site power plants, the majority of which burn fossil fuels. Because power plants are existing stationary

⁵³ SCAQMD, LST Methodology Appendix C - Mass Rate LST Look-Up Table, October 2009.

⁵⁴ SCAQMD, LST Methodology, June 2003, Revised July 2008.

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 Project vehicle trip generation was obtained from the trip generation estimates (Kimley-Horn, September 2024). Area source emissions are based on landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod.

To determine if a significant air quality impact would occur, the increase in regional operational emissions generated by the Project, not accounting for existing uses to be demolished, was compared against SCAQMD's significance thresholds. 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 analysis is conservative for the additional reason that credit from existing operational emissions, which would demonstrate further reduced emissions, has not been accounted for in the analysis. Operational emissions for the Project were calculated based on future buildout year. This is a conservative assumption as the CalEEMod and EMFAC models take into account more stringent vehicle emissions standards for future years. Refer to Appendix B of this Draft EIR for additional information regarding methodology.

(b) Localized Emissions

(i) On-Site Emissions

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

(ii) Off-Site Emissions

Potential localized CO concentrations from induced traffic at nearby intersections are also addressed, consistent with the methodologies and assumptions used in the consistency analysis provided in the 2003 AQMP. The 2003 AQMP was the latest AQMP to perform the modeling attainment demonstration for CO.⁵⁵

An analysis of CO "hot spots" determines whether the change in the level of service (LOS) of an intersection as a result of Project activities would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that one of the greatest contributors of CO to outdoor air is automobiles.⁵⁶ Vehicle emissions standards have become increasingly stringent

⁵⁵ SCAQMD, 2003 Air Quality Management Plan, Final 2003 AQMP Appendix V Modeling and Attainment Demonstrations, August 2003.

⁵⁶ U.S. Environmental Protection Agency, *Basic Information about Carbon Monoxide (CO) Outdoor Air Pollution*, 2023. <https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air->

in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent).⁵⁷ With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.^{58, 59}

Accordingly, with steadily decreasing CO emissions from vehicles, even very busy intersections generally do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the Air Basin by SCAQMD is useful for current evaluations of the potential for CO exceedances. CO attainment was thoroughly analyzed as part of SCAQMD's 2003 *Air Quality Management Plan*.⁶⁰ Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of air quality management planning. The Air Basin was re-designated as being in attainment for CO in 2007 and, as a result, CO is no longer addressed in the SCAQMD's AQMP.

As part of the 2003 AQMP CO Modeling Attainment Demonstration, an analysis was performed utilizing dispersion modeling.⁶¹ The Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35 ppm federal standard and 20 ppm state standard. As an initial screening step, if a project roadway segment does not exceed an ADT of 100,000 per day, then the project does not need to prepare a detailed CO hot spot analysis.

(c) Toxic Air Contaminants Impacts (Construction and Operation)

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with CARB's Air Quality and Land Use Handbook: A Community Health Perspective (CARB's Handbook), which provides recommendations regarding the siting of new sensitive land uses near potential sources for air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).⁶² SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality issues in General Plans and Local Planning.⁶³ Given that Page 2-3 of the SCAQMD guidance states that "the potential for public health impacts remains unchanged when siting sensitive receptors near a pollution source or a pollution source near a sensitive receptor," the City as Lead Agency has

pollution#:~:text=The%20greatest%20sources%20of%20CO,can%20affect%20air%20quality%20indoors, accessed August 2025.

⁵⁷ California Code of Regulations Section 1961, Exhaust Emission Standards and Test Procedures – 2004 through 2019 Model Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles, 2022. https://ww2.arb.ca.gov/sites/default/files/2023-02/cleancomplete_lev_ghg_regs_11_2022.pdf, accessed August 2025.

⁵⁸ South Coast Air Quality Management District, *Carbon Monoxide Redesignation Request and Maintenance Plan*, February 2005. https://ww2.arb.ca.gov/sites/default/files/classic/planning/sip/sccosip05/sccosip_redesig_mplan.pdf, accessed August 2025.

⁵⁹ U.S. Environmental Protection Agency, *Carbon Monoxide Trends*, 2023. <https://www.epa.gov/air-trends/carbon-monoxide-trends>, accessed August 2025.

⁶⁰ South Coast Air Quality Management District, *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*, August 2003, <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/2003-aqmp>, accessed August 2025.

⁶¹ South Coast Air Quality Management District, *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*, August 2003, <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/2003-aqmp>, accessed August 2025.

⁶² CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

⁶³ SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

elected to use the siting distances in Table 1-1 of the CARB Handbook for evaluating health risk impacts from both TAC sources and sensitive uses. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources and evaluating the potential for such sources to cause significant TAC impacts. If the qualitative evaluation does not rule out significant impacts from a new TAC source, or modification of an existing TAC emissions source, a more detailed analysis is conducted. For the detailed analysis, downwind sensitive receptor locations are identified, and site-specific dispersion modeling is conducted to estimate Project impacts.

c. Project Design Features

The Project would include the following Project Design Feature (PDF), which includes the use of USEPA Tier 4 Final-rated equipment.

Project Design Feature AQ-PDF-1: Off-Road Diesel-Powered Construction Equipment. All off-road diesel-powered construction equipment greater than 90 horsepower would meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request.

d. Analysis of Project Impacts

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

(1) Impact Analysis

As part of its enforcement responsibilities, USEPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the CAAQS require an air quality attainment plan to be prepared for areas designated as nonattainment under state or federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

(a) SCAQMD CEQA Air Quality Handbook Policy Analysis

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

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

(i) Criterion 1

With respect to the first criterion, as discussed under the analysis for Threshold (c), below, localized concentrations of NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} have been analyzed for the Project. SO₂ emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or affect a violation of the 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, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

As shown in **Table IV.A-4: Estimate of Maximum Regional Project Daily Construction Pollutant Emissions**, the increases in PM₁₀ and PM_{2.5} emissions during construction would not exceed the SCAQMD-recommended significance thresholds at sensitive receptors in proximity to the Project Site. Additionally, the Project's maximum potential NO_x and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in **Table IV.A-5: Localized Significance of Construction Emissions**, NO_x, CO, PM₁₀ and PM_{2.5} would not exceed the SCAQMD-recommended localized significance thresholds.

Table IV.A-4: Estimate of Maximum Regional Project Daily Construction Pollutant Emissions

Construction Year	Emissions (pounds per day) ^a					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction Emissions Prior to AQ-PDF-1						
Regional Construction Emissions - Winter						
Year 1 (2027)	1.56	13.62	18.64	0.03	2.63	0.81
Year 2 (2028)	1.50	9.41	18.11	0.03	2.60	0.78
Year 3 (2029)	4.02	10.05	21.52	0.03	3.44	0.97
Maximum Unmitigated Construction Emissions	4.02	13.62	21.52	0.03	3.44	0.97

Construction Year	Emissions (pounds per day) ^a					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(70.98)	(86.38)	(528.48)	(149.97)	(146.56)	(54.03)
Exceed Threshold?	No	No	No	No	No	No
Regional Construction Emissions - Summer						
Year 1 (2027)	2.09	19.10	24.00	0.04	3.31	1.76
Year 2 (2028)	1.50	9.30	19.48	0.03	2.60	0.78
Year 3 (2029)	4.03	9.91	23.35	0.03	3.44	0.97
Maximum Unmitigated Construction Emissions	4.03	19.10	24.00	0.04	3.44	1.76
SCAQMD Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(70.97)	(80.90)	(526.00)	(149.96)	(146.56)	(53.24)
Exceed Threshold?	No	No	No	No	No	No
Construction Emissions with AQ-PDF-1^b						
Regional Construction Emissions - Winter						
Year 1 (2027)	0.79	5.17	19.20	0.03	2.40	0.60
Year 2 (2028)	0.77	5.06	18.70	0.03	2.40	0.60
Year 3 (2029)	3.24	5.82	22.02	0.03	3.25	0.80
Maximum Unmitigated Construction Emissions	3.24	5.82	22.02	0.03	3.25	0.80
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(71.76)	(94.18)	(527.98)	(149.97)	(146.75)	(54.20)
Exceed Threshold?	No	No	No	No	No	No
Regional Construction Emissions - Summer						
Year 1 (2027)	0.47	4.66	24.80	0.04	2.63	1.14
Year 2 (2028)	0.78	4.95	20.08	0.03	2.40	0.60
Year 3 (2029)	3.25	5.68	23.86	0.03	3.25	0.80
Maximum Unmitigated Construction Emissions	3.25	5.68	24.80	0.04	3.25	1.14
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(71.75)	(94.32)	(525.20)	(149.96)	(146.75)	(53.86)
Exceed Threshold?	No	No	No	No	No	No
^a Required compliance with SCAQMD Rule 403 Fugitive Dust assumed. Refer to Appendix B of this Draft EIR for Model Data Outputs. ^b Project Design Feature AQ-PDF-1 includes use of Tier 4 Final construction equipment. Source: CalEEMod version 2022. Refer to Appendix B of this Draft EIR for model outputs.						

Table IV.A-5: Localized Significance of Construction Emissions

Source/Activity	Emissions (pounds per day) ^{a,b}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Construction Emissions Prior to AQ-PDF-1				
Localized Winter Emissions				
Demolition	12.43	14.44	1.19	0.54
Site Preparation	-	-	-	-
Grading	-	-	-	-
Infrastructure Improvements	8.25	9.91	0.26	0.24
Building Construction	7.89	9.88	0.23	0.21
Architectural Coating	0.79	1.11	0.01	0.01
Off-Site Utility Installation Demolition and Trenching	-	-	-	-
Off-Site Utility Installation Paving	-	-	-	-
Off-Site Site Preparation + Utility Demolition and Trenching	-	-	-	-
Off-Site Grading + Utility Demolition and Trenching and Off-Site Paving	-	-	-	-
Building Construction + Architectural Coating	8.68	10.99	0.24	0.22
Maximum Daily Emissions	12.43	14.44	1.19	0.54
SCAQMD LST (for 1.0 acres at 25 meters)	89	623	5	3
Over/(Under)	(76.57)	(608.56)	(3.81)	(2.46)
Exceed Threshold?	No	No	No	No
Localized Summer Emissions				
Demolition	-	-	-	-
Site Preparation	10.44	11.57	2.10	1.22
Grading	12.18	13.87	2.38	1.39
Infrastructure Improvements	-	-	-	-
Building Construction	7.89	9.88	0.23	0.21
Architectural Coating	0.79	1.11	0.01	0.01
Off-Site Utility Installation Demolition and Trenching	2.21	3.32	0.16	0.08
Off-Site Utility Installation Paving	3.32	4.96	0.14	0.13
Off-Site Site Preparation + Utility Demolition and Trenching	12.65	14.89	2.26	1.30
Off-Site Grading + Utility Demolition and Trenching and Off-Site Paving	17.71	22.15	2.40	1.43
Building Construction + Architectural Coating	8.68	10.99	0.24	0.22
Maximum Daily Emissions	17.71	22.15	2.40	1.43
SCAQMD LST (for 1.0 acres at 25 meters)	89	623	5	3
Over/(Under)	(71.29)	(600.85)	(2.60)	(1.57)
Exceed Threshold?	No	No	No	No

Source/Activity	Emissions (pounds per day) ^{a,b}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Construction Emissions with AQ-PDF-1²				
Localized Winter Emissions				
Demolition	2.27	14.56	0.77	0.16
Site Preparation	-	-	-	-
Grading	-	-	-	-
Infrastructure Improvements	3.54	10.47	0.03	0.03
Building Construction	3.54	10.47	0.03	0.03
Architectural Coating	0.65	0.96	<0.01	<0.01
Off-Site Utility Installation Demolition and Trenching	-	-	-	-
Off-Site Utility Installation Paving	-	-	-	-
Off-Site Site Preparation + Utility Demolition and Trenching	-	-	-	-
Off-Site Grading + Utility Demolition and Trenching and Off-Site Paving	-	-	-	-
Building Construction + Architectural Coating	2.89	11.43	0.03	0.03
Maximum Daily Emissions	3.54	14.56	0.77	0.16
SCAQMD LST (for 1.0 acres at 25 meters)	89	623	5	3
Over/(Under)	(85.46)	(608.44)	(4.23)	(2.84)
Exceed Threshold?	No	No	No	No
Localized Summer Emissions				
Demolition	-	-	-	-
Site Preparation	1.01	11.88	1.67	0.82
Grading	1.20	14.24	1.89	0.94
Infrastructure Improvements	-	-	-	-
Building Construction	3.54	10.47	0.03	0.03
Architectural Coating	0.65	0.96	<0.01	<0.01
Off-Site Utility Installation Demolition and Trenching	1.11	3.47	0.10	0.02
Off-Site Utility Installation Paving	0.96	5.24	0.01	0.01
Off-Site Site Preparation + Utility Demolition and Trenching	2.12	15.35	1.77	0.84
Off-Site Grading + Utility Demolition and Trenching and Off-Site Paving	3.27	22.95	2.00	0.97
Building Construction + Architectural Coating	4.19	11.43	0.03	0.03
Maximum Daily Emissions	4.19	15.35	2.00	0.97
SCAQMD LST (for 1.0 acres at 25 meters)	89	623	5	3
Over/(Under)	(84.81)	(607.65)	(3.00)	(2.03)
Exceed Threshold?	No	No	No	No
^a Mandatory compliance with SCAQMD Rule 403 Fugitive Dust applied for construction emissions. ^b Project Design Feature AQ-PDF-1 includes use of Tier 4 Final construction equipment. Source: CalEEMod version 2022. Refer to Appendix B of this Draft EIR for model outputs.				

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.⁶⁴ As indicated below, under the analysis for Threshold (c), no intersections would require a CO hotspot analysis, and impacts would be less than significant.

An analysis of potential localized operational impacts from on-site activities was also conducted. As shown in **Table IV.A-6: Localized Significance of Operational Emissions**, localized NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} operational impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants and would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

Table IV.A-6: Localized Significance of Operational Emissions

Activity	Emissions (pounds per day) ^{a,b}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Localized Winter Emissions				
On-Site Emissions (Area and Energy Sources)	0.07	0.06	0.01	0.01
SCAQMD Localized Screening Threshold (1.0 acre at 25 meters)	74	680	2	1
Over/(Under)	(73.62)	(674.61)	(1.02)	(0.75)
Exceed SCAQMD Threshold?	No	No	No	No
Localized Summer Emissions				
On-Site Emissions (Area and Energy Sources)	0.19	13.21	0.01	0.01
SCAQMD Localized Screening Threshold (1.0 acre at 25 meters)	74	680	2	1
Over/(Under)	(73.81)	(666.79)	(1.99)	(0.99)
Exceed SCAQMD Threshold?	No	No	No	No
^a As recommended by the SCAQMD, worst-case seasonal maximum daily emissions are reported.				
^b On-site emissions consist of area sources and energy sources.				
Source: CalEEMod version 2022. Refer to Appendix B of this Draft EIR for model outputs.				

(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.

⁶⁴ South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, 1993.

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

The 2022 AQMP contains air pollutant reduction strategies based on SCAG's growth forecasts included in the 2020-2045 RTP/SCS. SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. The Project is consistent with the City of Los Angeles General Plan land use designations and with the zoning for the Project Site and, therefore, the growth associated with the Project at the Project Site is validly assessed as being accounted for in SCAG's latest growth forecasts.

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.⁶⁵ Economic assumptions including employment rates and migration due to jobs area also included as part of the RTP/SCS forecast projections.

Growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that the number of households within the City will increase from 1,367,000 households in 2016 to 1,793,000 households in 2045, an increase of 426,000 households.⁶⁶ Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that the number of households within the City will increase from 1,398,600 in 2019 to 1,828,200 in 2050, an increase of 429,600 households and the population will increase from 3,907,200 in 2019 to 4,315,900 in 2050, an increase of 408,700 persons.⁶⁷ The Project proposes the demolition of 51 dwelling units and the development of 209 dwelling units for a net increase of 158 units. This projected net growth represents 0.04 percent of the anticipated increase for the City by year 2045 and 2050, and thus the Project's household growth would be within local and regional population projections. When utilizing the average household size of 3.35 for the South Los Angeles Community Plan area which is higher than the City, the Project's net 158 proposed units would result in a population increase of approximately 529 residents, representing 0.13 percent of the City's projected growth.^{68,69}

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 South Los Angeles Community Plan—the land use plan applicable to the Project Site. The Project-related population growth would be well within the Citywide growth projections. Thus, the Project would also be consistent with the AQMP under the second criterion.

⁶⁵ 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176, accessed August 2025.

⁶⁶ 2020–2045 RTP/SCS, Demographics and Growth Forecast adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579, accessed August 2025.

⁶⁷ Southern California Association of Governments, Regional Growth Forecasting, Table 13 Excel File, <https://scag.ca.gov/data-tools-forecasting>, accessed December 2025, accessed August 2025.

⁶⁸ $3.35 \times 158 = 529$

⁶⁹ Los Angeles Department of City Planning, South Los Angeles Demographic Profile, https://planning.lacity.gov/odocument/a547cb71-0d86-47d3-9717-d6059dea27e0/standard_report2022_SOUTH_LA_mail.pdf, accessed January 16, 2025, and 2020–2045 RTP/SCS, Demographics and Growth Forecast adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579, accessed August 2025.

- Does the project implement feasible air quality mitigation measures?

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

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

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

With regard to land use developments, such as the Project, the 2020-2045 RTP/SCS land use control measures (i.e., goals and policies) focus on locating future growth within Transit Priority Areas (TPAs) and reducing vehicle trips and VMT. The Project represents an infill development within an existing urbanized area that would concentrate new residential uses within a TPA as designated by the 2020-2045 RTP/SCS and a Priority Development Area as designated by the 2024-2050 RTP/SCS.^{70, 71} Therefore, the Project would be consistent with SCAG's 2020-2045 RTP/SCS and 2024-2050 RTP/SCS. The Project would be designed and constructed with sustainability and transit orientation as guiding principles. The Project Site is located within close proximity of several transit options including the Los Angeles County Metropolitan Transportation Authority (Metro) E Line located 0.3 miles northwest of the Project Site. Metro has multiple stops for bus routes that travel along the Project Site frontages, including the 2, 81, and 550 lines, which travel north/west along South Figueroa Street. The Los Angeles Department of Transportation (LADOT) also serves the Project Site with the DASH Southeast and King-East service routes. The Project would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC.

The Project would develop residential and commercial uses on the Project Site in close proximity to existing educational, office, retail, and restaurant uses, which would reduce VMT by encouraging walking and non-automotive forms of transportation; introducing new residential uses in close proximity to job centers, and increasing transit accessibility by locating new residential units within close proximity to existing bus routes and the Metro E Line. The Project is consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. Implementation of these sustainability features would contribute to a reduction in air quality emissions via a reduction in VMT. Accordingly, as the Project would support SCAG's and

⁷⁷ Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours.

⁷¹ Defined by the 2024-2050 RTP/SCS as areas within the SCAG region where future growth can be located to help the region each Plan goals by providing access to multiple modes of transportation and allowing for shorter trips by placing trip origins and destinations closer together.

SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project is consistent with the 2020-2045 RTP/SCS (i.e., control measures of the AQMP). Further, the Project is located adjacent to a High Quality Transit Corridor (HQTC)⁷². A discussion of the Project's consistency with the 2024-2050 RTP/SCS is included in Section IV.D, Land Use and Planning, of this Draft EIR.

In conclusion, the determination of AQMP consistency is primarily based on the long-term impacts of the Project on air quality in the Air Basin. The Project represents an infill development near transit within an existing urbanized area that would concentrate new residential uses within a TPA and Priority Development Area and along a HQTC, thus reducing VMT. The Project would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement measures to control NO_x, PM₁₀, and PM_{2.5} emissions. As discussed above, the Project would be consistent with the goals and policies of the AQMP.

(b) City of Los Angeles Policies

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

The Project would provide opportunities for use of alternative modes of transportation, including access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. Specifically, the Project includes 128 long-term bicycle spaces and 14 short-term bicycle spaces for residents, and two long-term bicycle spaces and two short-term bicycle spaces for visitors. In addition, the Project would be consistent with the development pattern in the vicinity that features greater concentration of urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and within 0.5 miles of major transit stops. Additionally, as discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, the Project would comply with City and 2022 CALGreen electric vehicle charging requirements. The Project would include 40 vehicle spaces that would consist of 34 parking spaces for residents and six parking spaces for visitors. The Project would provide 36 EV Ready spaces (all 34 of the residential parking spaces and 25 percent, or two, of the commercial parking spaces would be EV Ready) and would further be subject to the most updated version of the California Green Building Code at time of Project filing.

A more detailed analysis of the Project's consistency with the City's General Plan is presented in **Table IV.A-7: Project Consistency with City of Los Angeles General Plan (Air Quality Element)** on page IV.A-45 and demonstrates the Project's consistency with these goals.

⁷² A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." The City of Los Angeles defines peak hours as between 6:00 a.m. and 9:00 a.m. and between 3:00 p.m. and 7:00 p.m.

Accordingly, the Project would promote the City of Los Angeles General Plan Air Quality Element goals, objectives, and policies applicable to the Project.

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

Table IV.A-7: Project Consistency with City of Los Angeles General Plan (Air Quality Element)

Goals, Objectives, and Policies	Analysis of Project Consistency
Air Quality Element	
<p>Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.</p>	<p>No Conflict. The Project would introduce a mixed-use development contributing to the continued development of the City's South Los Angeles Community Plan area as an area for residential, employment, and retail services. The Project is an infill development within a densely populated urban area located within walking and biking distance to existing commercial and neighborhood-serving retail uses and transit. The Project would provide 209 residential units and 2,705 square feet of commercial uses in close proximity to several transit options including the Metro E Line located 0.3 miles northwest of the Project Site. Metro has multiple routes with stops that travel along the Project Site frontages, including the 2, 81, and 550 lines which travel north/west along South Figueroa Street. LADOT also serves the Project Site with the DASH Southeast and King-East service routes. The Project's focus on locating its growth near a heavily urbanized area and near mobility options demonstrates that the Project would contribute to reducing VMT. In addition, implementation of the City's Mobility Plan programs and California statute AB 2097 reduces or eliminates parking requirements for certain types of developments near transit (within half a mile). These reduction strategies would serve to reduce minimum parking standards, which is a demonstrated effective strategy to reduce VMT. Therefore, the Project would not conflict with this goal.</p>
<p>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.</p>	<p>No Conflict. The Project's location, land use characteristics, and Project Design Features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be consistent with the relevant SCAG growth projections in the SCAG 2020-2045 RTP/SCS which are used in preparing the 2022 AQMP. The growth projections in the SCAG 2024-2050 are similar to the growth projections in the SCAG 2020-2045 RTP/SCS. The Project includes bicycle parking spaces for the proposed uses as required by the LAMC and is well served by transit, including local and regional bus and rail lines. The Project would also focus growth in a high-density, jobs-rich area in close proximity to transit. The Project would, thus, reduce air emissions and increase traffic mobility while also sustaining economic growth. Therefore, the Project would not conflict with this objective.</p>
<p>Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate</p>	<p>No Conflict. The Project would comply with SCAQMD Rule 403, which requires dust control measures during</p>

Goals, Objectives, and Policies	Analysis of Project Consistency
<p>air pollutants emanating from unpaved areas, parking lots, and construction sites.</p> <p>Policy 1.3.1: Minimize particulate emission from construction sites.</p>	<p>construction activities. The Project would require the construction contractor(s) to comply with the applicable provisions of CARB's In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of diesel particulate matter filters and the retirement, replacement, or repowering of older dirtier engines with newer emission-controlled models. In addition, the Project would not include large areas of unpaved surfaces and would replace the existing surface parking lot with a portion of the Project building. Parking areas would be maintained in a clean and well-kept manner. The Project would thus reduce air emissions emanating from unpaved areas, parking lots, and construction sites. Therefore, the Project would not conflict with this objective or policy.</p>
<p>Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.</p>	<p>No Conflict. The Project Site is located in proximity to transit, encouraging alternative modes of transit, thereby reducing the distance traveled for future residents and employees. Future residents and employees on the Project Site would have access to the Metro E Line located 0.3 miles northwest of the Project Site. Metro has multiple routes with stops that travel along the Project Site frontages, including the 2, 81, and 550 lines which travel north/west along South Figueroa Street. LADOT also serves the Project Site with the DASH Southeast and King-East service routes. The Project's mix of uses, proximity to jobs and commercial services, and the option to use alternative modes of transportation would reduce reliance on single-occupant vehicles. Therefore, the Project would not conflict with this goal.</p>
<p>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.</p>	<p>No Conflict. The Project Site is served by the Metro Expo Line located 0.3 miles northwest of the Project Site. Metro has multiple routes with stops that travel along the Project Site frontages, including the 2, 81, and 550 lines which travel north/west along South Figueroa Street. LADOT also serves the Project Site with the DASH Southeast and King-East service routes. The accessibility to mass transit would encourage residents to utilize alternative modes of transportation, which would contribute to the reduction in trips. The Project would also locate new housing proximate to institutional uses and jobs accessible by pedestrians and bicyclists. The Project's mix of uses, proximity to jobs, institutional uses, entertainment, and commercial services, and the option to use alternative modes of transportation would help reduce trips, which is necessary to achieve regional air quality goals. Therefore, the Project would not conflict with this objective.</p>
<p>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.</p>	<p>No Conflict. The Project Site is served by the Metro Expo Line located 0.3 miles northwest of the Project Site. Metro has multiple routes with stops that travel along the Project Site frontages, including the 2, 81, and 550 lines which travel north/west along South Figueroa Street. LADOT also serves the Project Site with the DASH Southeast and King-East service routes. In addition, the Project would provide 128 long-term bicycle spaces and 14 short-term bicycle spaces for residents and two long-term bicycle spaces and two short-term bicycle spaces for visitors. The Project's mix of uses,</p>

Goals, Objectives, and Policies	Analysis of Project Consistency
	proximity to jobs, institutional uses, entertainment, and commercial services, and the option to use alternative modes of transportation would help reduce trips and VMT. Therefore, the Project would not conflict with this policy.
Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	No Conflict. The Project would reduce VMT due to its infill location, mixed-use development in a heavily populated area, and in proximity to public transportation within 0.3 miles of the Project Site. The Project's mix of uses, proximity to jobs, institutional uses, entertainment, and commercial services and the option to use alternative modes of transportation would help reduce trips and VMT and mobile source emissions. Therefore, the Project would not conflict with this goal.
Objective 4.1: It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.	No Conflict. The Project analysis of potential air quality impacts relied upon the numeric significance thresholds established by the SCAQMD, which considers attainment of the ambient air quality standards. The mixed-use Project would be developed in a TPA, which is a primary consideration in land use planning that contributes to the reduction in VMT which reduces air quality pollutant emissions. Therefore, the Project would not conflict with this objective.
Policy 4.1.2: Ensure that project level review and approval of land use development remain at the local level.	No Conflict. The Project environmental review and approval would occur at the local level. This Project-level EIR is being conducted by the City pursuant to CEQA requirements. Therefore, the Project would not conflict with this policy.
Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and VMT associated with land use patterns.	No Conflict. The Project would reduce VMT due to its infill location, development of residential uses in a heavily populated area in proximity to public transportation within 0.3 miles of the Project Site. Therefore, the Project would not conflict with this objective.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	No Conflict. The Project would reduce VMT due to its infill location, mixed-use development near places of employment, and access to public transportation within 0.3 miles of the Project Site. Therefore, the Project would not conflict with this policy.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	No Conflict. The Project would be connected to and accessible from existing sidewalks. In addition, the Project would provide 128 long-term bicycle spaces and 14 short-term bicycle spaces for residents and two long-term bicycle spaces and two short-term bicycle spaces for visitors. The Project would also comply with CALGreen and City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas. The Project Site is served by the Metro Expo Line located 0.3 miles northwest of the Project Site Metro has multiple routes that stop along the Project Site frontages, including the 2, 81, and 550 lines which travel north/west along South Figueroa Street. LADOT also serves the Project Site with the DASH Southeast and King-East service routes. Therefore, the Project would not conflict with this policy.
Policy 4.2.4: Require that air quality impacts be a consideration in the review	No Conflict. The environmental review conducted for the Project includes an analysis of air quality impacts, as

Goals, Objectives, and Policies	Analysis of Project Consistency
and approval of all discretionary projects.	presented in this section of this Draft EIR, which would be considered by the decision-maker(s) prior to taking any actions on the Project's discretionary approvals. Therefore, the Project would not conflict with this policy.
Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	No Conflict. The Project would occupy an infill location within 0.3 miles of existing public transportation, which would help promote transit usage and, in turn, reduce the number of vehicle trips to and from the Project Site. In addition, the Project would provide 128 long-term bicycle spaces and 14 short-term bicycle spaces for residents and two long-term bicycle spaces and two short-term bicycle spaces for visitors. Therefore, the Project would not conflict with this policy.
Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.	<p>No Conflict. The Project's location, land use characteristics, and Project Design Features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be consistent with the relevant SCAG growth projections in the SCAG 2020-2045 RTP/SCS which are used in preparing the 2022 AQMP. The growth projections in the SCAG 2024-2050 are similar to the growth projections in the SCAG 2020-2045 RTP/SCS. The Project includes bicycle parking spaces for the proposed uses as required by the LAMC and is well served by transit, including local and regional bus and rail lines. The Project would comply with applicable City and 2022 CALGreen electric vehicle charging requirements. The Project would voluntarily include 40 vehicle spaces, consisting of 34 parking spaces for residents and six parking spaces for visitors.</p> <p>The Project would provide 36 EV Ready spaces (all 34 of the residential parking spaces and 25 percent, or two, of the commercial parking spaces would be EV Ready) and would further be subject to the most updated version of the California Green Building Code at time of Project filing. Therefore, the Project would provide EV charging infrastructure that would support the 2022 Scoping Plan's focus on zero-emission transportation.</p> <p>The Project would also comply with City Ordinance No. 187,714, which requires all newly constructed buildings to be all electric, excluding the proposed restaurant uses.</p>
<p>Objective 5.1: It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.</p> <p>Policy 5.1.2: Effect a reduction in energy consumption and shift to non-polluting sources of energy in its building and operations.</p>	<p>No Conflict. The Project's location, land use characteristics, and Project Design Features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be consistent with the relevant SCAG growth projections in the SCAG 2020-2045 RTP/SCS which are used in preparing the 2022 AQMP. The growth projections in the SCAG 2024-2050 are similar to the growth projections in the SCAG 2020-2045 RTP/SCS. The Project includes bicycle parking spaces for the proposed uses as required by the LAMC and is well served by transit, including local and regional bus and rail lines. Moreover, the Project would comply with applicable City and 2022 CALGreen charging requirements. The Project would provide 36 EV Ready spaces (all 34 of the residential parking spaces and 25 percent, or two, of the commercial parking spaces would be EV Ready) and would further be subject to the most</p>

Goals, Objectives, and Policies	Analysis of Project Consistency
	updated version of the California Green Building Code at time of Project filing.
<p>Objective 5.3: It is the objective of the City of Los Angeles to reduce the use of polluting fuels in stationary sources.</p> <p>Policy 5.3.1: Support the development and use of equipment powered by electric or low-emitting fuels.</p>	<p>No Conflict. During operations, the Project would comply with the CARB Small Offroad Engine regulations which ban the sale of combustion powered landscaping equipment starting in 2024 and small combustion powered stationary generators starting in 2028.</p>
Source: Kimley-Horn and Associates, Inc. 2025.	

(c) Conclusion

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

(2) Mitigation Measures

Project-level impacts with regard to implementation of the applicable air quality plan would be less than significant during construction and over the operating life 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 are required, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Regional Emissions

(i) Construction

Construction associated with the Project including demolition, site grading, building construction, and architectural coating, as well as motor vehicle exhaust associated with on and offsite construction equipment, materials deliveries and worker trips, and the movement of construction equipment, particularly on unpaved surfaces, would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Air Basin include ozone-precursor pollutants (i.e., VOC and NO_x), PM₁₀, and PM_{2.5}. Construction-generated emissions of these criteria pollutants would be short-term and temporary, lasting only as long as the relevant phases of construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated were to exceed the SCAQMD limits adopted here as thresholds of significance.

Emissions of airborne particulate matter are largely generated by motor vehicle exhaust and ground disturbance. With respect to ground disturbance, the volume of airborne particulate matter is largely dependent on the type and amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water as dust control.

Construction activities for the Project were assumed to begin in 2027. Construction-generated emissions associated with the Project were calculated using CalEEMod, version 2022, which is designed to model emissions for land use development projects based on typical construction scenarios. It was assumed that all construction equipment operated during each individual phase would be operated simultaneously to provide a conservative analysis. See Appendix B of this Draft EIR for more information regarding the construction assumptions used in this analysis.

The predicted maximum daily construction-generated criteria pollutant emissions for the proposed Project are reported in **Table IV.A-4** on page IV.A-37. As noted in **Table IV.A-4**, the Project's emissions were calculated assuming mandatory compliance with SCAQMD Rule 403 fugitive dust control measures. The results summarized in **Table IV.A-4** show that the Project's regional criteria pollutant emissions during construction would remain below applicable thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}.

Project construction would also comply with SCAQMD Rules 402 (Nuisance),⁷³ 1113 (Architectural Coatings)⁷⁴ and CARB's anti-idling regulations, which prohibit idling for more than

⁷³ SCAQMD Rule 402 prohibits the discharge of quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public or have a natural tendency to cause injury or damage to business or property.

⁷⁴ SCAQMD Rule 1113 sets limits on the VOC content of architectural coatings.

five minutes; however, compliance with these rules was not assumed when estimating the Project's construction emissions for **Table IV.A-4**, above. Therefore, the Project's maximum-day construction emissions of criteria pollutants are conservative and would be even lower than reported in **Table IV.A-4** when the Project's compliance with SCAQMD Rules 402 and 1113 and CARB's anti-idling regulations are complied with.

As shown above, the Project's estimated criteria pollutant emissions during construction would be below their respective thresholds such that approval of the Project would not result in significant Project-level effects relating to regional air pollutant emissions.

(ii) *Operation*

The Project's operational emissions would be associated with area sources, energy sources, and mobile sources. Primary sources of operational criteria pollutants are from motor vehicle use and area sources. Long-term operational emissions attributable to the Project are summarized in **Table IV.A-8: Operational Criteria Pollutant Emissions**. The operational emissions sources are described below.

- *Area Source Emissions*. Area source emissions would be generated due to on-site equipment, architectural coating, and landscape maintenance equipment;
- *Energy Source Emissions*. Energy source emissions would be generated due to electricity usage associated with the Project. Primary energy uses include space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. The residential component of the Project would be all-electric and would not utilize natural gas;
- *Mobile Source Emissions*. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, VOC, NO_x, PM₁₀, and PM_{2.5} are all pollutants of regional concern. NO_x and VOC react with sunlight to form O₃, known as photochemical smog. Additionally, wind currents readily transport PM₁₀ and PM_{2.5}. However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions are based on the trip generation estimates analyzed for the Project set forth in Section IV. G, *Transportation*, of this DEIR, and have been incorporated into CalEEMod, as recommended by SCAQMD. Based on this analysis, the Project would generate 975 total daily vehicle trips.^{75,76}

⁷⁵ Kimley-Horn and Associates, Inc., 3822 Figueroa Transportation Assessment, March 2025.

⁷⁶ The Transportation Assessment for this Project, found in Appendix I, of this Draft EIR, notes that the Project would generate a total of 1,017 daily vehicle trips. This amount is derived using generation rates utilized in the LADOT VMT Calculator, however the Project estimated 975 daily vehicle trips which is derived using the ITE Trip Generation Manual generation rates. Pursuant to the City's Transportation Assessment Guidelines screening criteria, a project's daily vehicle trips may be estimated using the LADOT VMT Calculator tool or the most recent edition of the ITE Trip Generation Manual. A technical memorandum was prepared dated April 2026 that analyzes the relevant potential environmental impacts associated with the LADOT VMT Calculator trip generation figures, which confirmed impacts under that scenario remain less than significant. The technical memorandum is attached as Appendix K of this Draft EIR.

Table IV.A-8: Operational Criteria Pollutant Emissions

Source	Emissions (pounds per day) ^{a, b, c}					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Buildout Winter						
Area	0.65	0.00	0.00	0.00	0.00	0.00
Energy	<0.01	0.07	0.06	<0.01	0.01	0.01
Mobile	2.64	1.92	19.96	0.05	5.41	1.39
Proposed Project Total	3.29	1.99	20.02	0.05	5.41	1.40
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(51.71)	(53.01)	(529.98)	(149.95)	(144.59)	(53.60)
Exceed Threshold?	No	No	No	No	No	No
Buildout Summer						
Area	1.88	0.12	13.16	<0.01	0.01	0.01
Energy	<0.01	0.07	0.06	<0.01	0.01	0.01
Mobile	2.66	1.76	21.52	0.05	5.41	1.39
Proposed Project Total	4.55	1.95	34.73	0.06	5.42	1.41
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(50.45)	(53.05)	(515.27)	(149.94)	(144.58)	(53.59)
Exceed Threshold?	No	No	No	No	No	No
^a Worst-case seasonal maximum daily emissions are reported. ^b Emissions may not add up due to rounding. ^c Emissions from existing land uses to be demolished have not been accounted for to provide a worst-case analysis. Source: CalEEMod version 2022. Refer to Appendix B of this Draft EIR for model outputs.						

As shown in **Table IV.A-8**, and discussed above, operational (i.e., area, energy, mobile) emissions would not exceed SCAQMD thresholds for any criteria pollutant. Because this analysis does not account for existing operational emissions that will cease during Project operations, the total net level of air quality emissions during Project operations will be lower than the amount indicated in **Table IV.A-8**. Therefore, the Project would not violate any air quality standards or contribute substantially to an existing or projected air quality violation. As a result, approval of the Project would not result in any significant project-level effects relating to an increase of a criteria pollutant, including those for which the Project region is non-attainment.

Localized Emissions

The nearest sensitive receptors to the Project Site are multi-family residential uses located immediately adjacent to the Project Site to the west and south. To assess the potential for Project construction to create impacts to sensitive receptors, SCAQMD recommends utilizing its LSTs for construction. The LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative and are based on the ambient concentrations of the pollutant at issue for each source receptor area and distance to the nearest sensitive receptor. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the state or federal ambient air quality standard (applying the more

stringent of the two) in the local area surrounding the Project Site.⁷⁷ SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance.⁷⁸ The LST methodology assists lead agencies with conducting project-specific analysis of the potential localized impacts associated with proposed development projects.

(iii) Construction

Since CalEEMod calculates construction emissions based on the number of equipment hours, the maximum daily soil disturbance activity possible for each piece of equipment was used to determine the maximum daily disturbed acreage for the LST analysis.⁷⁹ For this Project, the appropriate source receptor area (SRA) for the LSTs is the Central LA (SRA 1) area, since this area includes the Project Site. LSTs take into consideration emissions of NO_x, CO, PM₁₀, and PM_{2.5}.⁸⁰ SCAQMD produced look-up tables for projects that disturb areas less than or equal to five acres in size.⁸¹ Based on the construction equipment modeled in CalEEMod, the grading phase of Project construction is anticipated to disturb approximately one acre in a single day. Thus, the LSTs applicable to this Project uses the SCAQMD-produced look up tables for a one-acre site.

SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs."⁸² Therefore, for purposes of the construction LST analysis, only the emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. SCAQMD's LST guidance recommends using the 25-meter threshold for receptors located 25 meters (or approximately 82 feet) or less from the Project Site.⁸³ Therefore, the LSTs for a one-acre site with a sensitive receptor distance of 25 meters was used for the LST construction analysis, consistent with the SCAQMD's LST guidance and methodology.

Table IV.A-5 on page IV.A-39 presents the emissions modeling results for the Project's localized emissions during construction for the four relevant parameters. SCAQMD Rule 403 reduction/ credits include properly maintaining mobile and other construction equipment, replacing ground cover in disturbed areas quickly, watering exposed surfaces three times daily, and watering all haul roads twice daily. Reductions percentages from the SCAQMD CEQA

⁷⁷ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed August 2025.

⁷⁸ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed August 2025.

⁷⁹ South Coast Air Quality Management District, *Sample Construction Scenarios for Projects Less than Five Acres in Size*, February 2005, <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-sample-construction-scenario-report.pdf?sfvrsn=2>, accessed August 2025.

⁸⁰ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed August 2025.

⁸¹ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-up Tables*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed August 2025.

⁸² South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed August 2025.

⁸³ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed August 2025.

Handbook (Tables XI-A through XI-E) were applied for the analysis of localized Project emissions during construction. As stated above, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations were not assumed when estimating the Project's localized construction emissions for Table IV.A-5. Therefore, the Project's maximum-day localized construction emissions analysis is conservative and actual emissions would actually be lower than reported in Table IV.A-5. Table IV.A-5 shows that the emissions of these pollutants on the peak day of construction would not exceed the LSTs and therefore would not expose the nearest sensitive receptors to substantial pollutant concentrations or cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, approval of the Project would not result in any significant effects relating to localized construction air pollutant concentrations.

(iv) Operation

According to SCAQMD's localized significance threshold methodology, operational LSTs apply only to on-site sources.⁸⁴ LSTs for receptors located at 25 meters for SRA 1 were utilized in this analysis. The one-acre LST threshold was conservatively used for the Project Site.⁸⁵ The on-site operational emissions were calculated using CalEEMod and are compared to the LST thresholds in **Table IV.A-6** on page IV.A-41.

The operational emissions shown in **Table IV.A-6** include all on-site Project-related sources (i.e., area and energy). On-site operational sources include stationary sources and/or on-site mobile equipment; off-site mobile emissions are not properly included.⁸⁶ The results of the LST analysis show that the Project's operation would not cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, approval of the Project would not expose the nearest sensitive receptors to substantial pollutant concentrations and would not result in any significant effects relating to operational air pollutant concentrations.

(b) Conclusion

According to SCAQMD guidance, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would have a cumulatively considerable contribution to emissions for those pollutants for which the Air Basin is in non-attainment. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.⁸⁷ As shown in **Table IV.A-4** and **Table IV.A-8**, Project construction and operational daily emissions at the Project Site would not exceed any of the SCAQMD's regional thresholds in the local area surrounding the Project Site. Similarly, as shown in **Table IV.A-5** and **Table IV.A-6**, construction and operational emissions from the Project would not exceed any of SCAQMD's localized significance thresholds at Project buildout. Thus, construction and operation of the Project would have less-than-significant impacts with regard to

⁸⁴ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed August 2025.

⁸⁵ Construction LST analysis is based on the amount of daily ground disturbance, which was calculated to be 1.5 acres. For operations, the size of the Project Site has been used.

⁸⁶ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed August 2025.

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

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 would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Construction

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

As discussed above in the methodology subsection, the localized construction air quality analysis was conducted using the methodology promulgated by SCAQMD. Look-up tables provided by SCAQMD were used to determine localized construction emissions thresholds for the Project.⁸⁸

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data for the Project area. The maximum daily localized emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for SRA 1, as presented in **Table IV.A-5**. As presented in **Table IV.A-5**. Maximum construction emissions would not exceed the SCAQMD localized screening thresholds. Therefore, on-site construction activities would not expose sensitive receptors to substantial pollutant concentrations and impacts with regard to localized emissions would be less than significant.

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

Consistent with the CO methodology above, if a traffic intersection in the vicinity of the Project Site does not exceed 100,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

According to peak-hour intersection turning movement data, the intersection with the greatest existing daily traffic volume is Figueroa and Martin Luther King Jr. Boulevard with 57,730

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

daily trips.⁸⁹ Project construction would result in a maximum of 163 worker trips and up to 12 haul trips (6 round trips) per day during construction of the Project.⁹⁰

Conservatively assuming that all of the Project construction would drive through this intersection, it would result in 57,905 total vehicles per day (ambient and project construction trips), which is lower than the daily traffic volumes of 100,000 per day that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. The Project's off-site construction activities, including the highest daily trips, would not expose sensitive receptors to substantial CO concentrations. As a result, impacts related to localized construction mobile-source CO emissions are considered less than significant.

(iii) On-Site and Off-Site Construction Activities (TACs)

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk, which is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 3 years (36 months), the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, SCAQMD's CEQA guidance does not require a health risk assessment (HRA) for short-term construction emissions. It is, therefore, not necessary to quantitatively evaluate long-term cancer impacts from construction activities, which occur over a relatively short duration. The Project's construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations. Project-related TAC impacts during construction would be less than significant.

(b) Operation

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

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria pollutants from on-site sources are presented in **Table IV.A-6**. The SCAQMD LST mass rate look-up tables were used to evaluate potential localized impacts. As shown in **Table IV.A-6**, on-site operational emissions would not exceed any of the LSTs. The Project's on-site operational activities, including generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, localized operational emissions resulting from the Project would be less than significant.

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

As discussed above, projects that would not produce traffic volumes resulting in more than 100,000 daily vehicles along intersections surrounding the Project Site would not require preparation of a detailed CO hot spot analysis. The Project would not produce the volume of traffic

⁸⁹ Federal Highway Administration, Travel Model Improvement Program, Time-of-Day Modeling Procedures: State-of-the Practice, State-of-the-Art, https://files.ceqanet.opr.ca.gov/276991-3/attachment/GIGE_RSnsEeuIThlwYrJFL_2T8rwzPTWIQHVMV8O5xDTIhJiq4C3phLbcztIewdiHK9ivcWsEFYesaWf0, Accessed August 2025.

⁹⁰ See Appendix B for modeling assumptions.

required to generate a CO hot spot in accordance with SCAQMD's 2003 CO hot-spot analysis. According to peak-hour intersection turning movement data, the intersection with the greatest existing daily traffic volume is Figueroa and Martin Luther King Jr. Boulevard with approximately 57,730 daily trips.⁹¹ As CO hotspots were not created at the Wilshire Boulevard and Veteran Avenue intersection even as it accommodated 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any of the intersections in the vicinity of the Project Site from an additional 717 daily vehicle trips (accounting for the existing trips to be removed) attributable to the Project. Therefore, approval of the Project would not result in any significant effects relating to CO concentrations. For all of the above reasons, approval of the Project would not result in any significant effects relating to exposure of sensitive receptors to substantial pollutant concentrations.

Toxic Air Contaminants (TAC)

The Project does not include a land use that has the potential to significantly impact nearby sensitive receptors with TAC generation during the proposed Project's operational phase, since the proposed Project would not generate trips by heavy-duty diesel trucks, which are an emitter of diesel particulate matter (DPM). Impacts to sensitive receptors from substantial pollutant concentrations would be less than significant.

The Project would include residential uses approximately 100 feet west of I-110. As such, the Project is subject to City Ordinance No. 184,245, which requires the provision of air filtration media that achieves a Minimum Efficiency Reporting Value (MERV) of 13 for regularly occupied areas of residential buildings located within 1,000 feet of the freeway. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, it can safely be concluded that the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

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

(2) Mitigation Measures

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

⁹¹ Federal Highway Administration, Travel Model Improvement Program, Time-of-Day Modeling Procedures: State-of-the-Practice, State-of-the-Art, https://files.ceqanet.opr.ca.gov/276991-3/attachment/GIGE_RSnsEeuIthlwYrJFL_2T8rwzPTWIQHVMV8O5xDTIhJiq4C3phLbcztlewdiHK9ivcWsEFYesaWf0, Accessed August 2025.

(3) Level of Significance After Mitigation

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

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and as evaluated in the Initial Study for the Project, which is included in Appendix A for this Draft EIR, no objectionable odors are anticipated as a result of either construction or operation of the Project. Construction-related activities would involve the use of construction vehicles and conventional building materials and coating typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. **Thus, the Project would have a less than significant impact with respect to Threshold (d). No further analysis of this issue is required.**

e. Cumulative Impacts

(1) Impact Analysis

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

(a) Construction

As discussed under Thresholds (b) and (c), above, the Project's construction-related air quality emissions and cumulative impacts would be less than significant. The Project would comply with regulatory requirements, including the SCAQMD 403 requirements listed above. Based on SCAQMD guidance, individual construction projects that exceed the recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of SCAQMD's regional or localized significance thresholds, including NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, the Project's contribution to cumulative air quality impacts due to regional and localized emissions would not be cumulatively considerable and, therefore, would be less than significant.

With respect to cumulative TAC emissions from Project and Related Project construction, as noted above, the greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations during the early grading and site preparation phases of project construction; none of the Related Projects are of the type that SCAQMD regulates or considers a major source of TAC emissions. According to SCAQMD

methodology, health effects from carcinogenic air toxics are described in terms of individual cancer risk, which is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. The Project and Related Projects have comparatively short-term construction schedules where TAC would be emitted of limited and definite duration and are therefore not considered significant sources of TAC emissions. Additionally, SCAQMD's CEQA guidance does not require an HRA for such short-term construction emissions. Given the limited duration of TAC emissions, and the highly localized nature of impacts, the Project's contribution to significant cumulative TAC impacts would not be cumulatively considerable and, therefore, would be less than significant. **Therefore, the Project's contribution to cumulative air quality impacts from construction due to regional and localized emissions would not be cumulatively considerable and, therefore, would be less than significant.**

(b) Operation

As discussed above, the Project's regional operational air quality emissions, localized emissions, and TACs would be less than significant. According to SCAQMD, if an individual project does not result in air emissions of criteria pollutants that exceed SCAQMD's recommended daily thresholds for project-level impacts, then the project would not result in a cumulatively considerable net increase of these pollutants.⁹² As analyzed above, because operational emissions do not exceed any of SCAQMD's regional or localized significance thresholds, the Project's operational contribution to cumulative air quality impacts due to regional and localized emissions would not be cumulatively considerable and is therefore less than significant.

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

⁹² SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003, Appendix D.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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