IV. Environmental Impact Analysis

A. Air Quality

1. Introduction

This section of the Draft EIR evaluates the Project's potential air quality impacts, as well as its potential cumulative air quality impacts, generated by construction and operation of the Project. The analysis in this section estimates the air pollutant emissions generated by Project construction and operation, and 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 in non-attainment of 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 the information, data, assumptions, calculation worksheets, and model outputs in the *Air Quality/Greenhouse Gas Emissions Technical Appendix* prepared by Environmental Science Associates (ESA) and included in Appendix B of this Draft EIR, unless otherwise stated.

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 the overall endeavor to prevent further deterioration and 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

[1] United States Environmental Protection Agency (USEPA), NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table, accessed January 11, 2021.

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 United States 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 federal and State air quality standards.[2] The NAAQS and CAAQS are listed in Table IV.A-1 on page IV.A-14.

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 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.

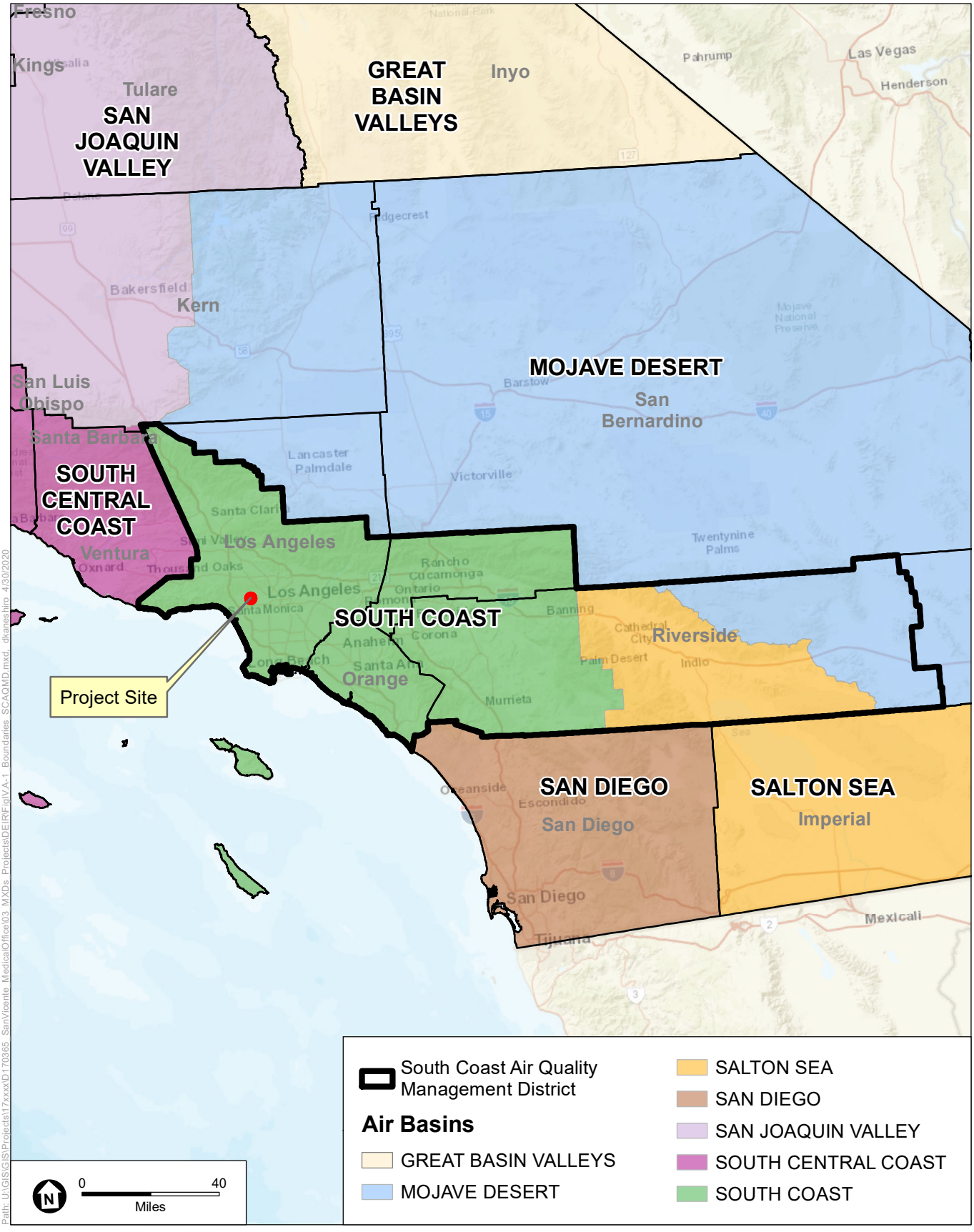
To meet the air quality standards, regional plans are developed, including the SCAQMD's Air Quality Management Plan (AQMP), which incorporates regional demographic projections and integrated regional land use and transportation strategies from SCAG's Regional Transportation Plan/Sustainable Communities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

(2) Local Air Quality and Air Pollution Sources

As mentioned above, the City of Los Angeles 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. **Figure IV.A-1, *Boundaries of the South Coast Air Quality Management District***, illustrates the location of the Air Basin. The regional climate within the Air

2 South Coast Air Quality Management District (SCAQMD), 2016 Air Quality Management Plan, March 2017, Appendix I.

3 SCAQMD, Map of Jurisdiction, 1999.



SOURCE: California Air Resources Board, March 2004

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Figure IV.A-1
Boundaries of the South Coast Air Quality Management District

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 the Pacific high. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid to late afternoons on hot summer days. Winter inversions frequently break by midmorning.

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

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

(3) Air Pollutant Types

(a) Criteria Pollutants

The six principal pollutants for which national and state criteria and standards have been promulgated, known as “criteria pollutants”, and which are most relevant to

current air quality planning and regulation in the Air Basin include: ozone (O_3), respirable and fine particulate matter (PM10 and PM2.5, respectively), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them.

(i) Ozone (O_3)

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

(ii) Particulate Matter (PM10 and PM2.5)

Particulate matter (PM) air 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 PM2.5, consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in areas like the City of Los Angeles, 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 PM2.5. 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 of Los Angeles, automobile

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

(iv) Nitrogen Dioxide (NO_2)

NOx is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic areas, such as urban areas like the City of Los Angeles, may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM10. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of O_3.

(v) Sulfur Dioxide (SO_2)

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. Emissions of SO_2 aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants leads 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 lead in air are usually found near lead smelters. The major sources of lead emissions to the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Lead is also emitted from the sanding or removal of old lead-based paint. Lead emissions are primarily a regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

(b) Additional Criteria Pollutants (California Only)

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

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

SO_4^{2-} are the fully oxidized ionic form of sulfur. Sulfates 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 sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to the fact that they are usually acidic, can harm ecosystems and damage materials and property.

(ii) Hydrogen Sulfide (H_2S)

H_2S is a colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields. Industrial sources of H_2S include petrochemical plants and kraft paper mills. H_2S is also formed during bacterial decomposition of human and animal wastes, and is present in emissions from sewage treatment facilities and landfills.[4] Exposure to H_2S can induce tearing of the eyes and

4 California Air Resources Board (CARB), Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed December 29, 2020.

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

(iii) Visibility-Reducing Particles

Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size, and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., sulfates, 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 PM2.5, 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 of exposure to high levels of vinyl chloride in the air include central nervous system effects, such as dizziness, drowsiness, and headaches while long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage and has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.[10] Most health data on vinyl chloride relate to carcinogenicity; thus, the

5 CARB, Hydrogen Sulfide and Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed December 29, 2020.

6 CARB, Hydrogen Sulfide and Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed December 29, 2020.

7 CARB, Visibility-Reducing Particles and Health, https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed April 28, 2020.

8 CARB, Visibility-Reducing Particles and Health, https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed April 28, 2020.

9 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed January 11, 2021.

10 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed January 11, 2021.

people most at risk are those who have long-term exposure to elevated levels, which is more likely to occur in occupational or industrial settings; however, control methodologies applied to industrial facilities generally prevent emissions to the ambient air.[11]

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

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, and stratospheric ozone-depleting compounds.

(i) Volatile Organic Compounds (VOCs)

VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, VOCs contribute with NOx to form ozone, and VOCs are regulated to prevent the formation of ozone.[12] Some VOCs are highly reactive and play a critical role in the formation of ozone, other VOCs have adverse health effects, and, in some cases, VOCs can be both highly reactive and have adverse health effects.[13] 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., architectural coatings, etc.).[14]

(ii) Toxic Air Contaminants (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

11 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed January 11, 2021.

12 USEPA, Technical Overview of Volatile Organic Compounds, https://www.epa.gov/indoor-air-quality-iaq/technical-overview-volatile-organic-compounds, last updated April 12, 2017, accessed April 28, 2020.

13 CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, page A-4.

14 CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, page A-4.

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 (CAA)
- California Clean Air Act (CCAA)
- California Code of Regulations (CCR)
- State Programs for Toxic Air Contaminants
- Diesel Risk Reduction Program
- South Coast Air Quality Management District (SCAQMD)
- Air Quality Management Plan (AQMP) and Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- City of Los Angeles General Plan Air Quality Element
- City of Los Angeles Plan for a Healthy LA

(1) Federal

(a) Federal Clean Air Act (CAA)

The Federal Clean Air Act of 1963 (CAA) was the first federal legislation regarding air pollution control and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990.[15] The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.[16] USEPA is responsible for the implementation and enforcement of the CAA, which establishes the NAAQS, specifies future dates for achieving compliance, and requires USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit

15 42 United States Code Section 7401 et seq. (1970).

16 USEPA, Summary of the Clean Air Act, https://www.epa.gov/laws-regulations/summary-clean-air-act, accessed April 28, 2020.

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 the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).[17,18]

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. The NAAQS were amended in 1997 to include an eight-hour standard for ozone and to adopt a NAAQS for PM2.5. The NAAQS were also amended in 2006 to include an established methodology for calculating PM2.5, as well as to revoke the annual PM10 threshold. **Table IV.A-1, *Ambient Air Quality Standards***, shows the NAAQS currently in effect for each criteria air pollutant.

TABLE IV.A-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Average Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
O_3[f]	One Hour	0.09 ppm (180 µg/m^3)	—	Same as Primary Standard
	Eight Hours	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	
NO_2[g]	One Hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)	None
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	53 ppb (100 µg/m^3)	Same as Primary Standard
CO	One Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	None
	Eight Hours	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	

17 USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, https://www.epa.gov/clean-air-act-overview/clean-air-act-text, last updated January 3, 2017, accessed April 28, 2020. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.

18 Mobile sources include on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Stationary sources are comprised of both point and area sources. Point sources are stationary facilities that emit large amount of pollutants (e.g., municipal waste incinerators, power plants). Area sources are smaller stationary sources that alone are not large emitters but combined can account for large amounts of pollutants (e.g., consumer products, building natural gas combustion).

TABLE IV.A-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Average Time	California Standards[a]	National Standards[b]	
		Concentration[c]	Primary[c,d]	Secondary[c,e]
SO_2[h]	One Hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)	—
	Three Hours	—	—	0.5 ppm (1,300 µg/m^3)
	24 Hours	0.04 ppm (105 µg/m^3)	0.14 ppm (for certain areas)[h]	—
	Annual Arithmetic Mean	—	0.030 ppm (for certain areas)[h]	—
PM10[i]	24 Hours	50 µg/m^3	150 µg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m^3	—	
PM2.5[i]	24 Hours	No Separate State Standard	35 µg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m^3	12.0 µg/m^3 [i]	15 µg/m^3
Lead[j,k]	30-Day Average	1.5 µg/m^3	—	
	Calendar Quarter	—	1.5 µg/m^3 (for certain areas)[k]	Same as Primary Standard
	Rolling 3-Month Average[k]	—	0.15 µg/m^3	
Visibility-Reducing Particles[l]	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more due to particles when relative humidity is less than 70 percent.	**No Federal Standards**	
Sulfates (SO_4^{2-})	24 Hour	25 µg/m^3	**No Federal Standards**	
Hydrogen Sulfide	One Hour	0.03 ppm (42 µg/m^3)	**No Federal Standards**	
Vinyl Chloride[j]	24 Hour	0.01 ppm (26 µg/m^3)	**No Federal Standards**	

TABLE IV.A-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Average Time	California Standards[a] Concentration[c]	National Standards[b] Primary[c,d]	National Standards[b] Secondary[c,e]

ppm = parts per million; ppb = parts per billion

[a] California standards for ozone, carbon monoxide (except eight-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms/per cubic meter (µg/m^3) is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[g] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.

[h] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Not applicable to the Project as SCAQMD was deemed in attainment of the 1971 standards on March 19, 1979.

[i] On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3.

[j] CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[k] The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved. Not applicable to the Project as SCAQMD was deemed in non-attainment (partial) of the 1971 standards on December 31, 2015 where the Partial Nonattainment designation – Los Angeles County portion of the Basin resulted from localized emissions from the two sources in the City of Vernon and the City of Industry that are no longer in operation. It is expected that this area would receive redesignation to attainment based on current monitoring data.

[l] In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

SOURCE: CARB, Ambient Air Quality Standards.

Title II pertains to mobile sources, which includes on-road vehicles (e.g. cars, buses, and motorcycles) and non-road vehicles (e.g. aircraft, trains, construction equipment). Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms 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 NOx 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 above) 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 against decreased visibility and damage to animals, crops, vegetation, and buildings.[19]

(2) State

(a) California Clean Air Act (CCAA)

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 practical date. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs within California.[20] 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. CARB also sets fuel specifications to further reduce vehicular emissions. Table IV.A-1, above, includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State. As shown in Table IV.A-1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet State standards for O_3, PM10, and PM2.5 and, therefore, is considered “non-attainment” for these pollutants.

(b) California Code of Regulations (CCR)

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

[19] USEPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table, accessed January 11, 2021.

[20] Chapter 1568 of the Statutes of 1988.

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.

CARB has primary responsibility for the development of California's SIP, for which it works closely with the federal government and the local air districts. The SIP is required for the State to take over implementation of the federal CAA from USEPA.

(c) On-Road and Off-Road Vehicle Rules

In 2004, CARB's Airborne Toxic Control Measure (ATCM) limits heavy-duty diesel motor vehicle idling to reduce public exposure to DPM and other TACs (Title 13 California Code of Regulations (CCR), Section 2485). Section 2485 limits the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction to five minutes at any location. In addition, Title 17, Section 93115 requires the operations of any stationary, diesel-fueled, compression-ignition engines meet specified fuel and fuel additive requirements and emissions standards.

In 2006, CARB regulations (13 CCR, Section 2281) required that the sulfur content of diesel fuel be reduced from 500 ppm to 15 ppm – commonly referred to as ultra-low sulfur diesel. The regulation reduces sulfur emissions from diesel fuel combustion and allows for DPM filter technologies to be installed on diesel-fueled vehicles and equipment without premature risk of failure due to clogging.

In 2008, CARB's Truck and Bus regulation reduces NOx, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR, Section 2025), which applies to nearly all diesel-fueled trucks and buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds. The largest diesel-fueled trucks, those with a GVWR greater than 26,000 pounds, must comply with a schedule by engine model year, or owners can report to show compliance with more flexible options, such as the installation of PM filters or low-use exemption.

In addition to limiting exhaust from idling trucks, CARB also adopted emission standards for off-road diesel construction equipment of greater than 25 horsepower (hp), such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The In-Use Off-Road Diesel-Fueled Fleets regulation adopted by the CARB on July 26, 2007, aims to reduce emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). Implementation is staggered based on fleet size (which is the total of all off-road horsepower under common ownership or control), with the largest fleets to begin compliance in 2014, medium fleets in 2017, and small fleets in 2019. Each fleet must demonstrate compliance through one of two methods. The first option is to calculate and maintain fleet average emissions

targets, which encourages the retirement or repowering of older equipment and rewards the introduction of newer cleaner units into the fleet. The second option is to meet the Best Available Control Technology (BACT) requirements by turning over or installing Verified Diesel Emission Control Strategies (VDECS) on a certain percentage of its total fleet horsepower. The compliance schedule requires that BACT turn overs or retrofits (VDECS installation) be fully implemented by 2023 in all equipment for large and medium fleets and by 2028 for small fleets.

(d) 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.

(e) Diesel Risk Reduction Program

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

developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

(3) Regional

(a) South Coast Air Quality Management District (SCAQMD)

SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the Air Basin, which includes all of Orange County; Los Angeles County (excluding the Antelope Valley portion); the western, non-desert portion of San Bernardino County; and the western Coachella Valley and San Gorgonio Pass portions of Riverside County.

(b) Air Quality Management Plan (AQMP) and Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The 2016 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O_3 and PM2.5 are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions sufficiently to meet the upcoming O_3 standard deadlines, as NO_X plays a critical role in the creation of O_3.[21] The AQMP's strategy to meet the 8-hour O_3 standard in 2023 should lead to sufficient NO_X emission reductions to attain the 1-hour O_3 standard by 2022. Since NO_X emissions also lead to the formation of PM2.5, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of PM2.5 levels and attainment of PM2.5 standards.[22,23]

The SCAQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emission reductions across federal, State, and local levels and industries. The 2016 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with the CARB and USEPA.

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21 NOx emissions are a precursor to the formation of both O_3 and secondary PM2.5.

22 Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see 2016 Air Quality Management Plan for detailed discussion).

23 SCAQMD, 2016 Air Quality Management Plan, March 2017, page ES-2.

The AQMP also incorporates the transportation strategy and transportation control measures from SCAG's adopted 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS). 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.[24] The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2016 AQMP for the Air Basin, are based on SCAG's 2016-2040 RTP/SCS.

The 2016 AQMP forecasts the 2031 emissions inventories ''with growth'' based on SCAG's 2016-2040 RTP/SCS. The region is projected to see a 12 percent growth in population, 16 percent growth in housing units, 23 percent growth in employment, and eight percent growth in vehicle miles traveled between 2012 and 2031. 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 federal, State, local, and levels.[25]

On September 3, 2020, the SCAG Regional Council adopted the Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), which is an update to the previous 2012–2035 RTP/SCS and 2016–2040 RTP/SCS.[26] The 2020-2045 RTP/SCS was determined to conform to the federally-mandated SIP, for the attainment and maintenance of NAAQS standards. On October 30, 2020, CARB also accepted SCAG's determination that the SCS met the applicable State greenhouse gas emissions targets. The 2020-2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

24 SCAQMD, 2016 Air Quality Management Plan, March 2017, page ES-2.
25 SCAQMD, 2016 Air Quality Management Plan, March 2017, Figure 1-4.
26 Southern California Association of Governments (SCAG), Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020.

(i) SCAQMD Air Quality Guidance Documents

The SCAQMD published the CEQA Air Quality Handbook (approved by the AQMD Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[27] 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.[28]

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.[29] 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. SCAQMDs 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.[30] The SCAQMD adopted additional guidance regarding PM2.5 emissions in a document called Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds.[31] The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and Final Localized Significance Threshold Methodology.

(ii) SCAQMD Rules and Regulations

SCAQMD has adopted rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards. The following SCAQMD rules and regulations may be applicable to the Project:

27 SCAQMD, CEQA Air Quality Handbook, April 1993.

28 SCAQMD, Air Quality Handbook, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#, accessed January 11, 2021.

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

30 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

31 SCAQMD, Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds, August 2006.

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events, including the following rules:

- **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 ($\mu g/m^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources, including the following rules:

- **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 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NOx emissions from natural gas-fired boilers, steam generators, and process heaters, as defined in this rule.
- **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 NOx 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 (refer to also Rule 403).

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 toxic air contaminants or other non-criteria pollutants, including the following rules:

- **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 (ACMs), 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 ACMs.
- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition (CI) engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.
- **Rule 1401 and Rule 1402 – New Source Review of Toxic Air Contaminants and Control of Toxic Air Contaminants from Existing Sources:** These two rules 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 the requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

(4) Local

(a) City of Los Angeles General Plan Air Quality Element

Local jurisdictions, such as the City of Los Angeles (City), have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. In general, the City of Los Angeles' General Plan (including the Framework, Air Quality, Mobility 2035, and Health and Wellness Elements) and the City of Los Angeles' Green New Deal (Sustainable pLAn 2019) 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 City.

The most directly-related of those plans, the City's General Plan Air Quality Element was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which 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 the Project 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 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, local governments 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.

(b) Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles, adopted by the City Council on March 31, 2015, 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

(a) Criteria Pollutants

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of air pollutant concentrations in the Air Basin are a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors, such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Thus, the worst air pollution conditions throughout the Air Basin typically occur from June through September. These conditions are generally attributed to the seasonally light winds and shallow vertical atmospheric mixing, which reduce the potential for the dispersal of air pollutant emissions, thereby causing elevated air pollutant levels. Air pollutant concentrations in the Air Basin vary with location, season, and time of day. Concentrations of ozone, 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.[32] Health and Safety Code Section 39607(e) requires CARB to establish and periodically review area designation criteria. **Table IV.A-2, *South Coast Air Basin Attainment Status (Los Angeles County)***, shows the attainment status of the Air Basin for each criteria pollutant with respect to National Standards (NAAQS) and California Standards (CAAQS). As shown in Table IV.A-2, the Air Basin is currently designated as nonattainment under the NAAQS for ozone and PM2.5; and as non-attainment for O_3, PM10, and PM2.5 under the CAAQS. The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal Pb standard; however, this is due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating.[33]

32 SCAQMD, 2016 Air Quality Management Plan, March 2017.

33 SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

As detailed in the AQMP, the major sources of air pollution in the Air Basin are divided into four major source classifications: point and area stationary sources, and on-road and off-road mobile sources. Point and area sources are the two major subcategories of stationary sources.[34] Point sources are permitted facilities that contain one or more emission sources at an identified location (e.g., power plants, refineries, emergency generator exhaust stacks). Area sources consist of many small emission sources (e.g., architectural coatings, consumer products, building natural gas combustion, restaurant charbroilers, and permitted sources, such as large boilers) which are distributed across the region. Mobile sources consist of two main subcategories, on-road sources (e.g., cars and trucks) and off-road sources (e.g., heavy construction equipment).

TABLE IV.A-2
SOUTH COAST AIR BASIN ATTAINMENT STATUS (LOS ANGELES COUNTY)

Pollutant	National Standards (NAAQS)	California Standards (CAAQS)
O_3 (one-hour standard)	N/A[a]	Non-attainment – Extreme
O_3 (eight-hour standard)	Non-attainment – Extreme	Non-attainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
PM10	Attainment	Non-attainment
PM2.5	Non-attainment – Serious	Non-attainment
Lead (Pb)	Non-attainment (Partial)[b]	Attainment
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride[c]	N/A	N/A

N/A = not applicable

[a] The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.

[b] Partial Non-attainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.

[c] In 1990, CARB identified vinyl chloride as a toxic air contaminant and determined that it does not have an identifiable threshold. Therefore, CARB does not monitor or make status designations for this pollutant.

SOURCE: USEPA, 2020. Green Book Non-Attainment Areas for Criteria Pollutants, https://www.epa.gov/green-book, accessed April 28, 2020; CARB, 2019. Area Designations Maps/State and National, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations, accessed April 28, 2020.

[34] SCAQMD, 2016 Air Quality Management Plan, March 2017, page 3-32.

(b) Toxic Air Contaminants

As described above, SCAQMD periodically assesses levels of TACs in the Air Basin. The greatest potential for TAC emissions during construction is related to DPM emissions emitted from heavy-duty equipment and long-term operations. The major sources of DPM may include heavy-duty diesel-fueled delivery trucks and stationary emergency generators.

Between July 2012 and June 2013, SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES IV), which is a follow-up to previous air toxics studies conducted in the Air Basin. The MATES IV Final Report was issued in May 2015. MATES IV, based on actual monitored data throughout the Air Basin, consisted of several elements including a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Air Basin from exposure to TACs. MATES IV concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Air Basin equates to a background cancer risk from long-term inhalation exposure to TAC emissions of approximately 418 in one million based on the average of 10 fixed monitoring sites and approximately 367 in one million based on a population-weighted average risk. The overall cancer risk was approximately 65 percent lower for the average of 10 fixed monitoring sites and approximately 57 percent lower for the population-weighted risk than the previous MATES III cancer risks.[35]

Subsequent to the SCAQMD's risk calculations estimates performed for MATES IV, the OEHHA updated its methods for estimating cancer risks, which utilizes higher estimates of cancer potency during early life exposures and uses different assumptions for breathing rates and length of residential exposures.[36] In March 2015, OEHHA adopted an updated guidance manual that incorporates advances in risk assessment with consideration of increased cancer potency for infants and children using Age Sensitivity Factors (ASF). The updated guidance manual also uses different assumptions for breathing rates and length of residential exposures. SCAQMD staff estimate that risks for the same long-term inhalation exposure level would be approximately 2.5 to 2.7 times higher using the updated methods, which would cause the average lifetime air toxics risk estimated from the monitoring sites data to change from approximately 418 in one million to 1,023 in one million for the average of 10 fixed monitoring sites and from approximately 367 in one million to 897 in one million for the population-weighted risk.[37] Under the updated OEHHA methodology, the relative reduction in the overall cancer risk from the MATES IV

35 SCAQMD, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, May 2015, page ES-2-3.

36 California Environmental Protection Agency (CalEPA), Office of Health Hazard Assessment, Air Toxics Hot Spots Program, Guidance Manual for Preparation of Health Risk Assessments, February 2015.

37 SCAQMD, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, May 2015, page 2-11.

results compared to MATES III would be the same (approximately 65 percent and 57 percent reduction in risk, respectively).

Approximately 68 percent of the risk is attributed to DPM emissions, approximately 22 percent to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde), and approximately 10 percent of all airborne carcinogenic risk is attributed to stationary sources (which include industries and certain other businesses, such as dry cleaners and chrome plating operations).[38] MATES IV also found lower ambient concentrations of most of the measured air toxics compared to the levels measured in the previous study conducted during 2004 and 2006. Specifically, benzene and 1,3-butadiene, pollutants generated mainly from vehicles, were down 35 percent and 11 percent, respectively.[39] The reductions were attributed to air quality control regulations and improved emission control technologies. In addition to air toxics, MATES IV included continuous measurements of black carbon and ultrafine particles (particles smaller than 0.1 microns in size), which are emitted by the combustion of diesel fuels. Sampling sites located near heavily-traveled freeways or near industrial areas were characterized by higher levels of black carbon and ultrafine particles compared to more rural sites.

(2) Local Area Conditions

(a) Existing Ambient Air Quality in the Surrounding Area

SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. The monitoring station most representative of the Project Site is the Northwest Coastal Los Angeles County Monitoring Station, located at Wilshire Boulevard and Sawtelle Boulevard, Los Angeles, CA 90025. Criteria pollutants monitored at this station include ozone, NO_2, and CO. The next most representative station is the Southwest Coastal Los Angeles County Monitoring Station located at 7201 West Westchester Parkway, Los Angeles, CA 90045. Criteria pollutants monitored at this station include SO_2, PM10, and Pb. The next most representative station is the South Coastal Los Angeles County Monitoring Station located at 1305 East Pacific Coast Highway, Long Beach, CA 90806. Criteria pollutants monitored at this station include PM2.5. The most recent data available from SCAQMD for this monitoring station are from years 2017 to 2019.[40] The pollutant concentration data for these years are summarized in **Table IV.A-3, *Ambient Air Quality in the Project Vicinity***. As shown in Table

38 SCAQMD, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, May 2015, page ES-2.

39 SCAQMD, Final Report – Multiple Air Toxics Exposure Study in the South Coast Air Basin, May 2015, page 6-1.

40 SCAQMD, Historical Data by Year, 2016-2018, https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year, accessed April 28, 2020.

IV.A-3, the CAAQS and NAAQS were not exceeded in the Project Site vicinity for most pollutants between 2017 and 2019, except for O_3, PM10, and PM2.5.

TABLE IV.A-3
AMBIENT AIR QUALITY IN THE PROJECT VICINITY

Pollutant/Standard	2017	2018	2019
Ozone, O_3 (one-hour)			
Maximum Concentration (ppm)	0.099	0.094	0.086
Days > CAAQS (0.09 ppm)	6	2	0
Ozone, O_3 (eight-hour)			
Maximum Concentration (ppm)	0.077	0.073	0.075
4th High eight-hour Concentration (ppm)	0.069	0.068	0.064
Days > CAAQS (0.070 ppm)	3	2	1
Days > NAAQS (0.070 ppm)	1	2	1
Nitrogen Dioxide, NO_2 (one-hour)			
Maximum Concentration (ppm)	0.056	0.065	0.048
Days > CAAQS (0.18 ppm)	0	0	0
98th Percentile Concentration (ppm)	0.046	0.046	0.043
Days > NAAQS (0.100 ppm)	0	0	0
Nitrogen Dioxide, NO_2 (Annual)			
Annual Arithmetic Mean (0.030 ppm)	0.010	0.013	0.01
Carbon Monoxide, CO (one-hour)			
Maximum Concentration (ppm)	2.0	1.6	1.9
Days > CAAQS (20 ppm)	0	0	0
Days > NAAQS (35 ppm)	0	0	0
Carbon Monoxide, CO (eight-hour)			
Maximum Concentration (ppm)	1.2	1.3	1.2
Days > CAAQS (9.0 ppm)	0	0	0
Days > NAAQS (9 ppm)	0	0	0
Sulfur Dioxide, SO_2 (one-hour)			
Maximum Concentration (ppm)	0.010	0.012	0.01
Days > CAAQS (0.25 ppm)	0	0	0
99th Percentile Concentration (ppm)	0.007	0.005	0.003
Days > NAAQS (0.075 ppm)	0	0	0
Sulfur Dioxide, SO_2 (24-hour)			
Maximum Concentration (ppm)	0.001	0.001	0.001
Days > CAAQS (0.04 ppm)	0	0	0

TABLE IV.A-3
AMBIENT AIR QUALITY IN THE PROJECT VICINITY

Pollutant/Standard	2017	2018	2019
Respirable Particulate Matter, PM10 (24-hour)			
Maximum Concentration (µg/m^3)	70	55	62
Samples > CAAQS (50 µg/m^3)	2	1	2
Samples > NAAQS (150 µg/m^3)	0	0	0
Respirable Particulate Matter, PM10 (Annual)			
Annual Arithmetic Mean (20 µg/m^3)	27.3	23.9	19.2
Fine Particulate Matter, PM2.5 (24-hour)			
Maximum Concentration (µg/m^3)	56.3	47.1	28
98th Percentile Concentration (µg/m^3)	31.1	27.7	20.70
Samples > NAAQS (35 µg/m^3)	5	2	0
Fine Particulate Matter, PM2.5 (Annual)			
Annual Arithmetic Mean (12 µg/m^3)	11.0	11.2	9.23
Lead			
Maximum 30-day average (µg/m^3)	0.005	0.005	0.004
Samples > CAAQS (1.5 µg/m^3)	0	0	0
Maximum 3-month rolling average (µg/m^3)	0.000	0.004	0.004
Days > NAAQS (0.15 µg/m^3)	0	0	0

ppm = parts per million; µg/m^3 = micrograms per cubic meter

SOURCE: SCAQMD, Historical Data by Year, 2017–2019, https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year, accessed December 20, 2020; CARB, Air Quality Data Statistics, http://www.arb.ca.gov/adam/; USEPA, AirData, http://www.epa.gov/airdata/ad_rep_mon.html, accessed April 28, 2020.

(b) Existing Health Risk in the Surrounding Area

SCAQMD has prepared a series of maps that show 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 represent the estimated number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years). The background potential cancer risk per million people in the Project Site area using the updated OEHHA methodology is estimated at 1,306 in one million (compared to an overall Air Basin-wide risk of 1,023 in one million for the average of 10 fixed monitoring sites).[41] Generally, the risk from

41 SCAQMD, Multiple Air Toxics Exposure Study, MATES IV Carcinogenic Risk Interactive Map, https://scaqmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=470c30bc6daf4ef6a43f0082973ff45f, accessed December 20, 2020.

air toxics is lower near the coastline and increases inland, with higher risks concentrated near large diesel sources (e.g., freeways, airports, rail yards and ports).

(c) Existing Site Emissions

The Project Site is currently developed with a 5,738-square-foot vacant educational building, and an 8,225-square-foot Big 5 Sporting Goods store.[42] Surface parking associated with these uses is located on the eastern portion of the Project Site with additional surface parking in the middle of the Project Site between the two buildings, and to the rear of the Big 5 Sporting Goods store (refer to **Chapter II, *Project Description***, of this Draft EIR for additional details). These existing uses would be demolished and removed to allow for development of the Project. Existing site emissions are associated with vehicle trips to and from the Project Site, on-site combustion of natural gas for heating, and fugitive emissions of VOCs from the use of aerosol products and coatings.

California Emissions Estimator Model (CalEEMod) software was used to estimate the existing site emissions from vehicle trips, natural gas appliances and equipment, and fugitive VOC emissions. Building natural gas usage rates have been adjusted to account for prior Title 24 Building Energy Efficiency Standards.[43] Mobile source emissions were estimated in CalEEMod using trip rates from the Project's Transportation Assessment.[44] A detailed discussion of the methodology used to estimate the existing Project Site emissions is provided below. The existing Project Site emissions are summarized in **Table IV.A-4, *Estimated Existing Site Regional Operational Emissions (Pounds Per Day)***. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

TABLE IV.A-4
ESTIMATED EXISTING SITE REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)

Source	VOC	NOx	CO	SO_2	PM10	PM2.5
Area	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Motor Vehicles	1	2	7	<1	2	<1
Total Existing Emissions	**1**	**2**	**7**	**<1**	**2**	**<1**

Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix B of this Draft EIR.

SOURCE: ESA, 2020.

42 The 5,738-square foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

43 California Air Pollution Control Officers Association (CAPCOA), CalEEMod User's Guide For CalEEMod Version 2016.3.2, Appendix E, Section 5, September 2016. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

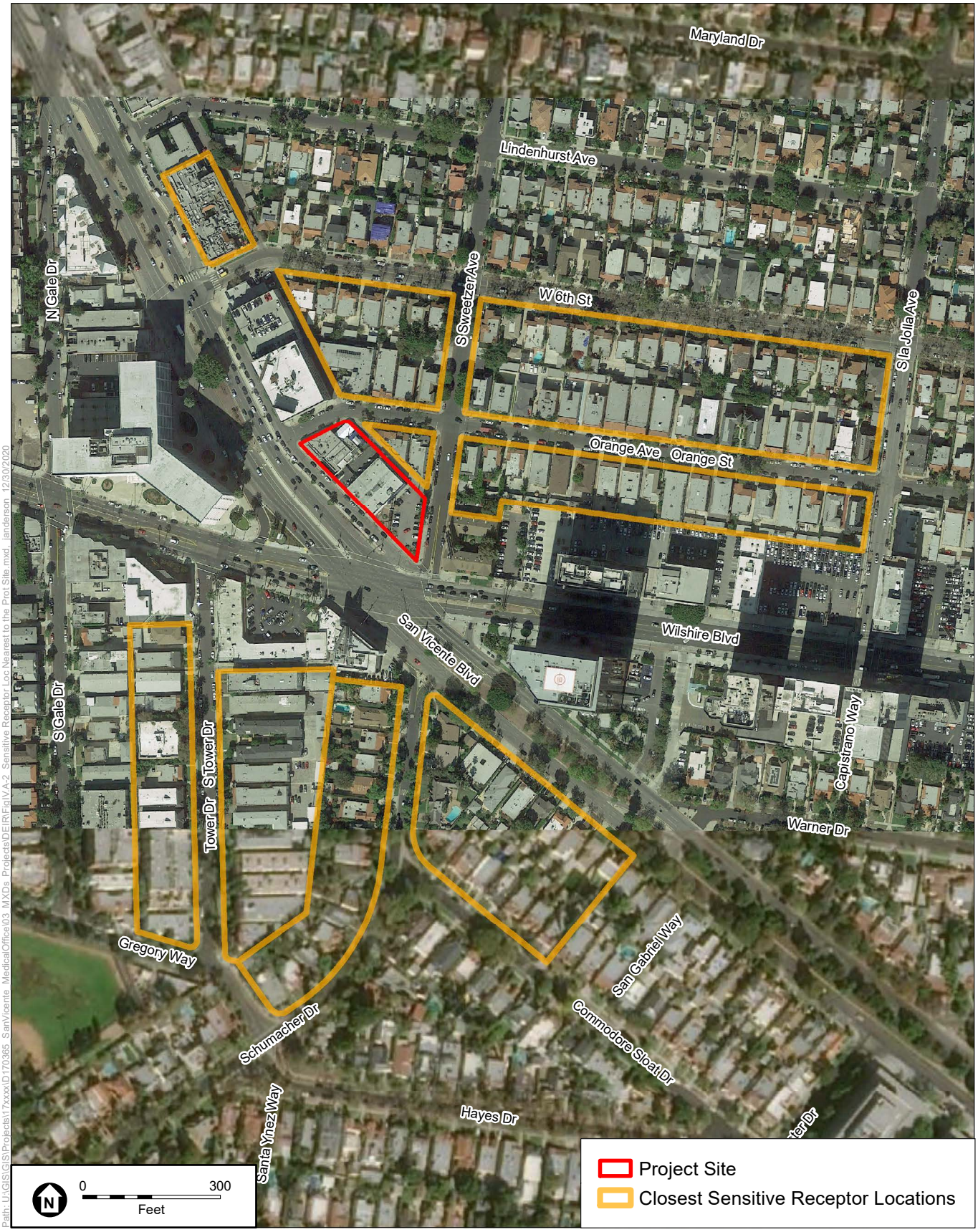
44 Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

(d) Sensitive Receptors and Locations

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others. As a result, certain land uses that are occupied by these population groups, such as residences, hospitals, and schools, are considered to be air quality-sensitive land uses. The Project Site is surrounded by existing commercial and residential uses, including air quality-sensitive land uses (i.e., multi-family residential uses and a nursing home) within approximately 500 feet of the Project Site, as shown in **Figure IV.A-2, *Sensitive Receptor Locations Nearest to the Project Site***. Air quality sensitive land uses nearest to the Project Site include the following:

- Multi-family residential uses approximately 20 feet (6 meters) to the northeast across the alley adjacent to the Project Site, fronting the south side of Orange Street at South Sweetzer Avenue in the City of Los Angeles;
- Multi-family residential uses approximately 50 feet (15 meters) to the north across Orange Street in the City of Los Angeles;
- Multi-family residential uses approximately 60 feet (18 meters) to the east fronting the east side of South Sweetzer Avenue at Orange Street in the City of Los Angeles;
- Multi-family residential uses approximately 185 feet (56 meters) to the northeast fronting the south side of Orange Street at South Sweetzer Avenue in the City of Los Angeles;
- Multi-family residential uses approximately 280 feet (85 meters) to the south along Schumacher Drive in the City of Los Angeles;
- Multi-family residential uses approximately 300 feet (91 meters) to the southwest along South Tower Drive in the City of Beverly Hills;
- Nursing home approximately 410 feet (125 meters) to the northwest in the City of Los Angeles; and
- Multi-family residential uses approximately 450 feet (137 meters) to the southwest along South Tower Drive in the City of Beverly Hills.

All other air quality-sensitive uses are located at greater distances from the Project Site and, as such, would experience lower air pollutant impacts from potential sources of pollutants from the Project Site due to atmospheric dispersion effects, and are therefore not listed.



SOURCE: Google Earth, 2016 (Aerial).

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Figure IV.A-2
Sensitive Receptor Locations Nearest to the Project Site

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a 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; or

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 are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate air quality impacts are listed below:

- 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 Roads
  - 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.

While these factors are important inputs in determining the amounts and nature of air pollution emissions generated by a project during construction, construction air quality emissions are evaluated in consideration of the criteria set forth by SCAQMD. Pursuant to the CEQA Guidelines (Section 15064.7), a lead agency may consider using, when available, significance thresholds established by the applicable air quality management district or air pollution control district when making determinations of significance. For purposes of this analysis, the City has determined to assess the potential air quality impacts of the Project in accordance with the most recent thresholds adopted by SCAQMD in connection with its CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook, and subsequent SCAQMD guidance, as discussed below, and this assessment satisfies the considerations raised in the 2006 L.A. CEQA Thresholds Guide.[45]

Consistency with Applicable Air Quality Plans. In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to evaluate the Project's consistency with the SCAQMD's 2016 AQMP and the City's General Plan Air Quality Element:

- Criterion 1: Will 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: Will the Project exceed the assumptions utilized in preparing the AQMP?

The Project's potential impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's 2016 AQMP and applicable City General Plan Air Quality Element plans and policies.

Construction and Operational Emission Air Quality Standards. A significant impact may occur if a project would add a cumulatively considerable contribution

45 While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Project construction and operation would not include sources of lead emissions and would not exceed the significance thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial land use projects such as the Project. As a result, lead emissions are not further evaluated in this Draft EIR.

of a federal or State non-attainment pollutant. The Air Basin is currently in non-attainment for ozone, PM10, PM2.5, and lead (which is only in non-attainment for the Los Angeles County portion of the Basin).[46] SCAQMD methodology recommends that significance thresholds be used to determine the potential cumulative impacts to regional air quality along with a project's consistency with the current AQMP.

SCAQMD has established numerical significance thresholds for construction and operational activities. The numerical thresholds are based on the recognition that the Air Basin is a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health.[47] Given that construction impacts are temporary and limited to the construction phase, SCAQMD has established numerical significance thresholds specific to construction activity. Based on the thresholds in the SCAQMD CEQA Air Quality Handbook, the Project would potentially result in a significant impact of a federal or State non-attainment pollutant if emissions of ozone precursors (VOC and NOx), PM10, or PM2.5 would exceed the values shown in **Table IV.A-5, *SCAQMD Regional Emissions Thresholds***.[48]

TABLE IV.A-5
SCAQMD REGIONAL EMISSIONS THRESHOLDS (POUNDS PER DAY)

Activity	VOC	NOx	CO	SO_2	PM10	PM2.5
Construction	75	100	550	150	150	55
Operation	55	55	550	150	150	55

SOURCE: SCAQMD, SCAQMD Air Quality Significance Thresholds, April 2019.

Localized Emission Impacts on Sensitive Receptors. In addition, SCAQMD has developed a methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards or ambient concentration limits. Impacts would be considered significant if the following would occur:

- Maximum daily localized emissions of NOx and/or CO during construction or operation are greater than the applicable localized significance thresholds,

46 SCAQMD has the Partial Nonattainment designation – Los Angeles County portion of the Basin resulted from localized emissions from the two sources in the City of Vernon and the City of Industry that are no longer in operation. It is expected that this area would receive redesignation to attainment based on current monitoring data. SCAQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin.

47 SCAQMD, CEQA Air Quality Handbook, April 1993.

48 SCAQMD, Air Quality Significance Thresholds, April 2019.

resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for NO_2 of 0.18 ppm over one hour and 0.03 ppm annually and/or CO of 20 ppm over one hour and nine ppm over eight hours.[49]

- Maximum daily localized emissions of PM10 and/or PM2.5 during construction are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 10.4 µg/m^3 over 24 hours (SCAQMD Rule 403 control requirement).
- Maximum daily localized emissions of PM10 and/or PM2.5 during operation are greater than the applicable localized significance thresholds, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed 2.5 µg/m^3 over 24 hours (SCAQMD Rule 1303 allowable change in concentration).
- The following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
  - The Project would cause or contribute to an exceedance of the CAAQS one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively.
  - Where the CO standard is exceeded at the intersection, a project would result in a significant impact if the incremental increase due to the project is equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard.

SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards or ambient concentration limits without project-specific dispersion modeling.[50] This analysis uses the screening criteria to evaluate impacts from localized emissions where applicable.

Toxic Air Contaminants and Sensitive Receptors. Based on SCAQMD thresholds, the Project would cause a significant impact by exposing sensitive receptors to toxic air contaminants if any of the following would occur:[51]

- The Project emits carcinogenic materials or TACs that exceed the maximum incremental cancer risk of ten in one million or a cancer burden greater than 0.5 excess cancer cases (in areas greater than or equal to one in one million) or an acute or chronic hazard index of 1.0.

49 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

50 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

51 SCAQMD, CEQA Air Quality Handbook, April 1993.

Objectionable Odors and Other Emissions. With respect to other emissions, such as odors, the Project would be considered significant if it created objectionable odors affecting a substantial number of people. In addition, based on the thresholds in the SCAQMD CEQA Air Quality Handbook, the Project would potentially result in a significant impact of an attainment, maintenance, or unclassified pollutant if emissions of CO or SO_2 would exceed the values shown in Table IV.A-5.[52]

b) Methodology

The evaluation of potential impacts to regional and local air quality that may result from the construction and long-term operations of the Project is discussed below. Additional details are provided in the Air Quality/Greenhouse Gas Emissions Technical Appendix in Appendix B of this Draft EIR.

(1) SCAQMD Air Quality Guidance Documents

SCAQMD published the CEQA Air Quality Handbook to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[53] 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. However, SCAQMD is currently in the process of replacing the CEQA Air Quality Handbook with the Air Quality Analysis Guidance Handbook. While this process is underway, SCAQMD recommends using approved models to calculate emissions from land use projects, such as the CalEEMod software, which is a model developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California Air Districts. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions from a variety of land use projects.

SCAQMD also provides 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.[54] SCAQMD's general land use 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, a 1,000-foot siting distance for sensitive land uses proposed in proximity to a major service and maintenance rail yard, and the same siting criteria for distribution centers and dry cleaning facilities). SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential

52 SCAQMD, Air Quality Significance Thresholds, April 2019.
53 SCAQMD, CEQA Air Quality Handbook, April 1993.
54 SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005.

health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies. The Project Site is not located within 500 feet of a freeway,1,000 feet from a major service and maintenance rail yard or distribution center, or 500 feet of a dry cleaner; therefore, existing sources of TAC emissions are not located within the SCAQMD's screening distances of the future Project occupants.

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.[55] SCAQMD provides additional guidance regarding PM2.5 emissions in a document called *Final Methodology to Calculate Particulate Matter (PM)2.5 and PM2.5 Significance Thresholds*.[56] This latter document has been incorporated into SCAQMD's CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

(2) Consistency with Air Quality Management Plan

SCAQMD is required, pursuant to the CAA, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., ozone and PM2.5).[57] As described above, SCAQMD's 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving five NAAQS related to these pollutants, including transportation control strategies from SCAG's 2016–2040 RTP/SCS designed to reduce VMT.[58] The 2016 AQMP control strategies were developed, in part, based on regional growth projections prepared by SCAG through 2040.[59] For this reason, projects whose growth is consistent with the assumptions used in the 2016–2040 RTP/SCS will be deemed to be consistent with the 2016 AQMP because their growth has already been included in the growth projections utilized in the formulation of the control strategies in the 2016 AQMP. Thus, emissions from projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the 2016 AQMP would not jeopardize attainment of the air pollutant reduction goals identified in the AQMP even if their emissions exceed SCAQMD's numeric indicators.[60] As noted above, the 2016 AQMP has been adopted by SCAQMD and CARB. Therefore, this analysis

55 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

56 SCAQMD, Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds, August 2006.

57 The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this was due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating. For reference see SCAQMD, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.

58 SCAQMD, 2016 Air Quality Management Plan, March 2017, page ES-6, 4-42.

59 SCAQMD, 2016 Air Quality Management Plan, March 2017, page 4-42 to 4-44.

60 SCAQMD, CEQA Air Quality Handbook, April 1993, page 12-1.

considers the consistency of the Project (refer to **Chapter II, *Project Description***, of this Draft EIR for additional details) with the 2016 AQMP based on the AQMP's consistency with applicable growth projections and emission control strategies.

(3) Consistency with General Plan – Air Quality Element

As discussed previously, the City's General Plan Air Quality Element includes Citywide goals, objectives, and policies that guide the City in the implementation of its air quality improvement programs and strategies. Goals, objectives, and policies of the Air Quality Element relevant to the Project include minimizing traffic congestion and increasing energy efficiency, as well as reducing air pollutant emissions consistent with the 2016 AQMP. The analysis below provides a side-by-side comparison of each of the relevant provisions in the Air Quality Element with the Project to determine the whether the Project would be consistent with those provisions.

(4) Existing Project Site Emissions

Existing operational site emissions were estimated using CalEEMod, as described above. For mobile sources, the vehicle trips and VMT were obtained for the existing uses from the Project's Transportation Assessment, which incorporates the City's VMT analysis procedures and VMT Calculator (Version 1.2).[61]

Emissions from on-site natural gas combustion were based on usage data from the California Energy Commission's California Commercial End Use Survey (CEUS), which lists energy demand by building type.[62] The CEC establishes building energy efficiency standards, which are updated periodically. The CEUS provides data on a limited statewide basis for different climate zones. Because CalEEMod applies correction factors to account for compliance with recent updates to the Title 24 Building Energy Efficiency Standards (i.e., 2019 Title 24 standards), energy demand is adjusted to account for assumed compliance with older Title 24 Building Energy Efficiency Standards, based on available conversion data.[63]

Other sources of emissions from existing uses include equipment used to maintain site landscaping, such as lawnmowers and trimmers. CalEEMod uses landscaping equipment emission factors from CARB's off-road (OFFROAD) emissions factor

61 Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

62 California Energy Commission, California Commercial End-Use Survey, https://www.energy.ca.gov/data-reports/surveys/california-commercial-end-use-survey, accessed December 20, 2020.

63 CAPCOA, CalEEMod User's Guide For CalEEMod Version 2016.3.2, Appendix E, Section 5, September 2016.

model and CARB's *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment*.[64] CalEEMod assumes that landscaping equipment operates for 250 days per year in the Air Basin. Fugitive VOC emissions are based on consumer product usage factors provided by SCAQMD within CalEEMod and architectural coating emission factors based on SCAQMD Rule 1113.

(5) Construction Emissions

Construction air quality impacts were assessed based on the incremental emissions increase from Project construction emissions compared to baseline emissions from the Project Site. Under CEQA, the baseline environmental setting for an EIR is generally established at or around the time that the Notice of Preparation (NOP) for the EIR is published (i.e., January 14, 2020).

Project construction activities would have the potential to create regional air quality impacts. Project construction activities would generate air pollutant emissions from vehicle trips generated by construction workers, vendor trucks, and haul trucks traveling to and from the Project Site, and building activities such as the application of paint and other surface coatings. The Project's daily regional criteria pollutant emissions during construction have been estimated by assuming a conservative scenario for construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying mobile source and fugitive dust emissions factors. The emissions have been estimated using CalEEMod, an emissions inventory software program, recommended by SCAQMD, and CARB's on-road vehicle emissions factor EMFAC2017 (EMFAC) model. The input values used in this analysis were adjusted to be Project-specific based on equipment types and construction phase schedule. Heavy-duty off-road equipment that would be used during construction of the Project were provided by the Applicant's contractor representative. CalEEMod is based on outputs from CARB's OFFROAD and EMFAC models, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles.

These values were applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions from construction equipment and worker vehicle trips for each construction activity based on the maximum expected number of supply and material trucks and the maximum number of workers and visitors traveling to the site during all phases of Project construction. Haul truck trip estimates were based on Applicant-approved approximated excavation volumes and an assumed soil haul truck capacity of 10 cubic yards. Concrete truck trip estimates were based on Applicant-approved approximated mat foundation volumes and an assumed concrete truck capacity of

64 CARB, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, June 13, 2003.

nine cubic yards. Worker trips and vendor supply and material supply truck trips were estimated based on the scale of the Project and phasing and were approved by the Applicant. Criteria pollutant emissions from haul trucks, cement trucks and vendor trucks were estimated outside of CalEEMod using EMFAC emission factors for heavy-duty trucks.

Construction phasing would include demolition of the existing buildings and associated parking, site clearing, grading, excavation, and building construction. The Project would export approximately 12,222 cubic yards of excavated soil and approximately 1,740 cubic yards of demolition debris (asphalt parking lot demolition, interior and exterior building demolition, and general construction debris). Emissions from these activities were estimated by construction phase. The maximum daily emissions were predicted values for the worst-case emissions day, and do not represent the emissions that would occur for every day of Project construction. The maximum daily construction emissions were compared to SCAQMD daily regional significance thresholds. Detailed assumptions of the Project's construction phasing and equipment list are provided in the Air Quality and Greenhouse Gas Emissions Technical Appendix for the Project, which is provided in Appendix B of this Draft EIR.[65]

Project construction is estimated to start in 2021 with an estimated completion in 2023, over an approximately 34-month construction period. The actual construction start may commence at a later date. If this occurs, construction impacts would be lower in the later date than those analyzed here for 2021 due to the use of a more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to State regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment. As a result, should Project construction commence at a later date than analyzed in this Draft EIR, air quality impacts would be lower than the impacts disclosed herein.

(6) Operational Emissions

Project operational emissions were estimated using CalEEMod to forecast the daily regional criteria pollutant emissions from on-site area and stationary sources that would occur during long-term Project operations.

For mobile sources, the estimated vehicle trips and maximum daily VMT were provided for the Project uses in the Project's Transportation Assessment, which incorporates the City's VMT analysis procedures and VMT Calculator (Version

65 Impacts from asbestos and lead-based paint from Project demolition are expected to be less-than-significant implementation of regulatory measures, respectively. For additional details please refer to **Section IX, *Hazards and Hazardous Materials*** of the Initial Study, which is provided in Appendix A of this Draft EIR.

1.2).[66] The City's VMT Calculator is based on Institute of Transportation Engineers (ITE) trip generation rates and utilizes socioeconomic, transit, and trip length data from the Los Angeles citywide travel demand model that is calibrated to Los Angeles conditions in order to adjust the trips for internalization, transit, and walkability.[67] The estimated VMT from the Project's Transportation Assessment takes into account trip distance reductions due to the Project's characteristics, including internal capture from co-locating medical office and retail/restaurant uses on the Project Site, increasing the on-site job density, neighborhood and site walkability and connectivity, and proximity to public transit and job centers. CARB's EMFAC model was used to generate Air Basin-specific vehicle fleet emission factors. These emission factors were then applied to the daily VMT to obtain daily mobile source emissions.

Operation of the Project has the potential to generate criteria pollutant emissions from vehicle and truck trips traveling to and from the Project Site. In addition, emissions would result from area sources located on-site such as natural gas combustion from water heaters, boilers, and restaurant cooking stoves, landscaping equipment, and use of consumer products. The Project is not expected to contain any large stationary combustion equipment such as large boilers or combustion turbines. Natural gas usage factors in CalEEMod are based on the CEC 2006 CEUS data adjusted to reflect more recent Title 24 improvements.

Stationary sources would include an on-site emergency generator with an estimated capacity of approximately 300 kilowatts (402 hp). The emergency generator would result in emissions during maintenance and testing operations. Maintenance and testing would not occur daily, but rather periodically, up to 50 hours per year per Rule 1470. For the purposes of estimating maximum daily emissions, it is estimated that the emergency generator would operate for up to one hour each in a day for maintenance and testing purposes. Emergency generators are permitted by SCAQMD and regulated under SCAQMD Rule 1470.

Operational air quality impacts were assessed based on the incremental increase in emissions compared to baseline conditions. Under CEQA, the baseline environmental setting for an EIR is generally established at or around the time that the NOP for the EIR is published (i.e., January 14, 2020). As discussed previously, the Project Site is currently developed with an vacant 5,738-square-foot educational buildingand an 8,225-square-foot Big 5 Sporting Goods store, with

66 Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

67 Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

surface parking.[68] These existing uses would be demolished and removed to allow for development and operation of the Project. However, the net change in operational emissions is based on the difference between the existing operational emissions of the Project Site and the Project's operational emissions of the Project Site. The Project's maximum daily net operational emissions are compared to the SCAQMD daily regional significance thresholds.

Project operation is conservatively estimated at the earliest feasible year after construction (i.e., 2023), but may commence at a later date. If the onset of Project operations is delayed to a later date than assumed in the modeling analysis, operational impacts would be less at a later date than those analyzed here in 2023 due to the improving vehicle technology that would be more fuel-efficient and lead to a cleaner vehicle fleet mix travelling to and from the Project Site as reflected in EMFAC mobile source emission factors. As a result, should Project buildout be completed at a later date than analyzed in this Draft EIR, air quality impacts would be lower than the impacts disclosed herein.

(7) Localized Emissions

Project construction activities would also have the potential to create local air quality impacts. Project construction activities would generate air pollutant emissions from fugitive dust from grading and demolition and building activities such as the application of paint and other surface coatings. The localized effects from the on-site portion of the Project's construction emissions were evaluated at the nearby sensitive receptor locations that would be potentially impacted by Project construction in accordance with the SCAQMD's Final Localized Significance Threshold Methodology.[69] The localized significance thresholds address only NOx, CO, PM10, and PM2.5 emissions. SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds, and therefore, would not cause or contribute to an exceedance of the applicable ambient air quality standards without the need for Project-specific dispersion modeling. The localized analysis for the Project is based on this SCAQMD screening criteria. The Project Site is located within the boundaries of the Wilshire Community Plan area and is approximately 0.76 acres in size, with the nearest off-site receptors located approximately 20 feet (6.10 meters) to the northeast of the Project. Therefore, the screening criteria used in the analysis were those applicable for a one-acre site in the Central LA area with sensitive receptors located within 25 meters, which

68 The 5,738 square foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

69 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

accounts for all adjacent off-site sensitive receptors.[70] The maximum net daily emissions from construction of the Project were compared to these screening criteria.

The localized effects from the on-site portion of the maximum daily net emissions from Project operation were evaluated at the nearby sensitive receptor locations that would be potentially impacted by operation of the Project according to the SCAQMD's Final Localized Significance Threshold Methodology.[71] The localized impacts from operation of the Project were assessed similar to the construction emissions, as discussed previously.

(8) Carbon Monoxide Hotspots

The greatest quantities of CO are produced from motor vehicle combustion of fossil fuels and are usually concentrated at or near ground-level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Localized areas where ambient concentrations exceed State and/or federal CO standards are termed "CO hotspots." The potential for the Project to cause or contribute to the formation of off-site CO hotspots was evaluated based on prior dispersion modeling SCAQMD conducted of the four busiest intersections in the Air Basin that for its CO Attainment Demonstration Plan in the 2016 AQMP. The Project analysis compares the intersections with the greatest peak-hour traffic volumes that would be impacted by the Project to the intersections modeled by SCAQMD. Project-impacted intersections with peak-hour traffic volumes lower than the intersections modeled by SCAQMD, in conjunction with background CO levels, would not exceed the CO concentrations modeled in the 2016 AQMP.

(9) Toxic Air Contaminant Emissions (Construction and Operations)

The greatest potential for TAC emissions during construction would be related to DPM emissions associated with heavy-duty equipment during excavation and grading activities. Construction activities associated with the Project would be sporadic, transitory, and short-term in nature (approximately 34 months). As further described below, the City is not required to conduct a quantified HRA for mixed-use commercial projects, such as the Project, as the applicable standards and guidance that are available are intended for evaluation of health risks associated with stationary long-term sources of TAC emissions. Rather than being a stationary source of TAC emissions, the Project's emissions are largely from mobile sources, and, while the Project would generate localized TAC emissions during

70 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008, page 3-3. "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters."

71 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

construction, the associated activities and exposures would be short- rather than long-term.

OEHHA developed the *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments* (Guidance Manual), in conjunction with CARB, for use in implementing the Air Toxics "Hot Spots" Program (Health and Safety Code Section 44360 et. seq.).The intent in developing the Guidance Manual was to provide HRA procedures for use in the Air Toxics Hot Spots Program or for the permitting of new or modified stationary sources. The Project is not a "Hot Spots" Program project but rather involves the construction and operation of a mixed-use development that would include medical office and retail/restaurant uses. While OEHHA provides limited guidance on how to conduct HRAs for short-term projects, it makes it clear there is "considerable uncertainty" in evaluating cancer risk over short-term durations. In addition, the Guidance Manual does not identify short-term projects or non-stationary source projects that warrant the preparation of a HRA, nor does it recommend the preparation of HRAs for short-term construction projects or non-stationary source projects, like the Project.

The SCAQMD has not adopted guidance that requires that quantitative health risk assessments be performed for short-term exposures to TAC emissions. In addition, SCAQMD states that "SCAQMD currently does not have guidance on construction Health Risk Assessments" and has not adopted guidance that establishes a methodology or that requires lead agencies to use the 2015 OEHHA Guidance Manual when assessing short-term TAC exposures from construction emissions for CEQA analyses.[72] Thus, a qualitative assessment of the impacts associated with the Project's short-term construction TAC emissions is provided in the analysis section below.

During long-term operations, TACs could be emitted as part of periodic maintenance operations, period testing and maintenance of the emergency generator, restaurant charbroiling, cleaning, painting, etc., and from periodic visits from delivery trucks and service vehicles. However, these uses are expected to be occasional and result in minimal exposure to off-site sensitive receptors. As the Project consists of primarily medical offices and to a lesser degree, commercial/restaurant uses, the Project would not include sources of substantial

72 SCAQMD, Final Environmental Assessment for: Proposed Amended Rule 307.1 – Alternative Fees for Air Toxics Emissions Inventory; Proposed Amended Rule 1401 – New Source Review of Toxic Air Contaminants; Proposed Amended Rule 1402 – Control of Toxic Air Contaminants from Existing Sources; SCAQMD Public Notification Procedures for Facilities Under the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) and Rule 1402; and, SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk, page 2-23, September 2016. SCAQMD only applies the revised OEHHA Guidelines for operational impacts at stationary industrial source facilities that are in the AB 2588 Air Toxics Hot Spots program, which does not apply to the Project.

TAC emissions identified by SCAQMD or CARB siting recommendations.[73,74] Thus, a qualitative analysis is appropriate for assessing the Project's operational emissions.

c) Project Design Features

No specific project design features are proposed with regard to air quality. As discussed in **Section IV.I, *Transportation***, of this Draft EIR, the Project would implement Project Design Feature TRAF-PDF-1, Transportation Demand Management (TDM) Program, which would include strategies in a TDM Program that would service to reduce VMT. No additional air quality-related project design features are applicable to the Project.

d) Analysis of Project Impacts

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

(1) Impact Analysis

To assess whether the Project would conflict with or obstruct implementation of an applicable air quality plan, this analysis evaluates the Project's consistency with SCAQMD's AQMP and SCAG's RTP/SCS, and City of Los Angeles policies.

(a) Air Quality Management Plan

In accordance with SCAQMD's CEQA Air Quality Handbook, Chapter 12, the following criteria are required to be addressed to determine the Project's consistency with applicable SCAQMD and SCAG policies:

(i) 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?

Localized concentrations of NO_2 as NO_X, CO, PM10, and PM2.5 have been analyzed for the Project. SO_2 emissions would be negligible during construction and long-term operations, in part due to the ultra-low sulfur diesel regulations (13 CCR, Section 2281), and, therefore, would not have the potential to cause or affect a violation of the SO_2 ambient air quality standard (detailed Project construction

73 SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005, Table 2-3.

74 CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Table 1-1.

and operations emissions calculations are provided in Appendix B of this Draft EIR). Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. However, due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

The Project's NOx, CO, PM10, and PM2.5 emissions during construction and operations were analyzed: (1) to ascertain potential effects on localized concentrations; and (2) to determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards for NOx, CO, PM10, and PM2.5. As shown below in **Table IV.A-10, *Estimated Maximum Mitigated Localized Construction Emissions (pounds per day)*,** the increases in localized emissions of NOx, CO, PM10, and PM2.5 during construction would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site with implementation of mitigation as detailed under Threshold (c) below. As shown below in **Table IV.A-9, *Estimated Maximum Localized Operational Emissions for Existing Sensitive Receptors*,** the increases in localized emissions of NOx, CO, PM10, and PM2.5 emissions during operations would not exceed the SCAQMD-recommended localized significance thresholds at sensitive receptors in proximity to the Project Site. **Therefore, Project construction and operations would be less than significant with regards to localized air quality and would not cause an increase in the frequency or severity of existing air quality violations and would not cause or contribute to new air quality violations.**

Because the Project would not introduce any substantial stationary sources of emissions, CO is the appropriate benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.[75] As indicated below in Threshold (c) and the results of the carbon monoxide hotspot analysis for the Project by comparing Project intersections with prior studies conducted by SCAQMD in support of their AQMPs and considering existing background CO concentrations, no intersections would result in a CO hotspot in excess of the ambient air quality standards, and impacts would be less than significant. **Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.**

Thus, in response to Criterion 1, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As shown in **Table IV.A-9**, the Project would not exceed any of the State and federal standards, and localized NO_2 as NO_x, CO, PM10, and PM2.5 operational impacts would be less than significant. **Therefore, the Project would**

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

also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

(ii) Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?

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 2016–2040 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 consistency with applicable population, housing, and employment growth projections and appropriate incorporation of AQMP control measures. The following discussion provides an analysis with respect to these criteria.

(a) Air Quality Management Plan Consistency

As discussed above, SCAQMD has adopted a series of AQMPs to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements, while taking into account construction and operational emissions associated with population and economic growth. SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, the lead agency should assess whether the project would directly obstruct implementation of the plan by impeding SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5) and whether it is consistent with the demographic and economic assumptions (typically land use related, such as employment population) upon which the plan is based.[76] SCAQMD guidance indicates that projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment, even if a project results in emissions of air pollutants that exceed applicable significance thresholds.[77] SCAQMD develops the AQMP and its attainment strategies by taking into account regional economic and regional population growth.[78] The AMQP demonstrates a substantial decrease in expected criteria pollutant levels in the air basin in the future based on various control strategies and technological improvements, even with economic and population growth.[79]

(i) Construction Growth Projections

The Project would generate short-term construction jobs, which are not expected to bring new construction workers or their families into the region, since construction workers are typically drawn from an existing regional pool of

76 SCAQMD, CEQA Air Quality Handbook, April 1993, page 12-2, 12-3.
77 SCAQMD, CEQA Air Quality Handbook, April 1993, page 12-1.
78 SCAQMD, 2016 Air Quality Management Plan, March 2017, page ES-1, 1-5, 1-6.
79 SCAQMD, 2016 Air Quality Management Plan, March 2017, pages ES-1, 1-5, 1-6.

construction workers who travel among construction sites within the region as individual projects are completed, and are not typically brought from other regions to work on developments such as the Project. Moreover, these jobs would be relatively small in number and temporary in nature. **Therefore, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based and would not exceed the long-term employment projections utilized in preparing the AQMP.**

(ii) Operational Growth Projections

The Project's growth would be consistent with the growth projections contained in the 2016–2040 RTP/SCS. The Project is conservatively anticipated to be operational at the earliest feasible date in 2023. As discussed in Section XIV, *Population and Housing*, of the Initial Study, which is provided in Appendix A of the Draft EIR, the Project would result in a net increase in the number of employees on the Project Site of approximately 566 employees. As discussed therein, Project increases in employment would provide a small contribution to anticipated growth for the period between 2019 and 2023, the Project buildout year, for the City as a whole and the increase in growth would be consistent with SCAG's growth projections for the City.[80] The Project's increases in employment would therefore not conflict with SCAG's 2016–2040 RTP/SCS growth projections, which form the basis of the growth projections in the 2016 AQMP.

As discussed above under **Subsection IV.A.3.b), *Methodology***, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality reductions identified in the AQMP, even if their emissions exceed the SCAQMD's significance thresholds.[81] The Project is consistent with the growth projections and control strategies used in the development of the 2016 AQMP, and the Project growth would occur in a HQTA, resulting in highly transportation-efficient growth, which would support reductions in transportation-related emissions as compared to the air basin average based on the default CalEEMod assumptions. **Therefore, the Project's growth would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based and would not exceed long-term employment projections utilized in preparing the AQMP.**

80 As shown in Table 4 in **Section XIV, *Population and Housing***, of the Initial Study in Appendix A of this Draft EIR, the Project's net increase in employment of 566 would constitute approximately 0.85 percent of the 2019 to 2023 employment growth projection for the City of Los Angeles.

81 SCAQMD, CEQA Air Quality Handbook, April 1993, page 12-1.

(b) Control Strategies

(i) Construction

During its construction phase, the Project would comply with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Furthermore, the Project would comply with fleet rules to reduce on-road truck emissions (i.e., 13 CCR, Section 2025 (CARB Truck and Bus regulation)). **Therefore, Project construction would be compliant with these measures and requirements would be consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities utilized in preparing the AQMP.**

(ii) Operation

The Project's location, design, and land uses render it consistent with the 2016 AQMP during operations. As discussed above, the 2016 AQMP includes land use and transportation strategies from the 2016–2040 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. The majority of these strategies are to be implemented by cities, counties, and other regional agencies, such as SCAG and SCAQMD although some can be furthered by individual development projects.

The Project's location, design, and land uses would support land use and transportation strategies related to reducing vehicle trips for patrons and employees by increasing commercial density near public transit. The Project is considered an "urban infill" project, as it would replace existing commercial uses with a high-density, commercial development. The Project proposes higher density, consistent with compact growth, on a parcel of infill urban land accessible to and well served by public transit including the Metropolitan Transportation Authority (Metro) bus routes 30/330, 20/720, 728 and 105/705 and Antelope Valley Transit Authority (AVTA) bus route 786, and the future Wilshire/La Cienega Metro D (Purple) Line Station, and would be focused in an HQTA. This analysis provides evidence of the Project's consistency with the 2016 AQMP's goal of reducing mobile source emissions as a source of NOx and PM2.5. As described above, by locating its medical office and commercial/restaurant uses within an area that has existing high quality public transit (with access to existing regional bus and future rail service), and existing off-site residential, office, retail, and restaurant uses all within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in Wilshire Community Plan area of Los Angeles, the Project would reduce vehicle trips and VMT, and the corresponding reduction in air pollutant emissions.

The Project's mobile source emissions are calculated based on the VMT generated by the Project as obtained from the Project's Transportation

Assessment were used to estimate on-road mobile source GHG emissions, which take into account the Project Site's location within the City, incorporates VMT reductions from the land use characteristics, and Project-specific transportation demand management features (refer to **Section IV.I, *Transportation***, of this Draft EIR for a discussion of the TDM Program features).[82] **Therefore, the Project would not conflict with the 2016 AQMP in regard to transportation control strategies from the 2016-2040 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions utilized in preparing the AQMP.**

(iii) Conclusion

Based on the above analysis, the Project would not conflict with applicable air quality policies of the 2016 AQMP. Therefore, impacts would be less than significant.

(b) General Plan Air Quality Element

The Project would promote the General Plan Air Quality Element goals, objectives and policies as listed in **Subsection IV.A.2.b)(4)(a), *City of Los Angeles Air Quality Element***, above and specifically analyzed in Appendix B of this Draft EIR. In particular, the Project location and characteristics, as discussed above, would achieve several goals, policies and objectives of the Air Quality Element by locating its development in an urban infill area and by establishing a land use pattern that promotes sustainability. As described above, the Project would support and encourage pedestrian activity in the Wilshire Community Plan area. At the same time, the Project would reduce vehicle trips and air pollutant emissions generated by the proposed development by locating medical office and commercial/restaurant uses within an identified HQTA that has multiple public transit options (with access to existing regional bus and future rail service), and existing off-site residential, office, retail, and restaurant uses, all within walking distance. As such, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT.

The reduction in VMT is supported by a number of land use characteristics, such as proposed location, mix of land uses, proximity to alternative transportation options, and pedestrian oriented design. The Project would provide a mix of medical office and commercial/restaurant land uses. Increased land use diversity and mixed-uses is a VMT-reducing characteristic for projects that locate different types of land uses near one another since trips between land use types are shorter and can be accommodated by alternative modes of transportation, such as public

82 Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

transit, bicycles, and walking.[83] The Project Site is located in an area that offers access to multiple other nearby destinations, including restaurant, bar, office, retail, entertainment, and residential uses. Increased destination accessibility provides ready access to multiple destinations in close proximity to the Project Site, which encourages walking and non-automotive forms of transportation.[84] The Project Site is also located within a half-mile of public transportation, including Metro bus routes 30/330, 20/720, 728 and 105/705 and AVTA bus route 786, and the future Wilshire/La Cienega Metro D (Purple) Line Station. Increased transit accessibility facilitates the use of transit by people traveling to or from a location.[85] Furthermore, the Project would provide an internal pedestrian network for Project visitors and employees that links to the existing off-site pedestrian network where pedestrian access to the Project Site from surrounding neighborhoods to the retail-commercial uses would be from the South Sweetzer Avenue and South San Vicente Boulevard street frontages. Access to the office uses would be from the ground level lobby for the office building along the South San Vicente Boulevard frontage road and from the parking levels via internal stairs and elevators. Visitors and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking. Providing pedestrian and bicycle access that minimizes barriers and links the Project Site with existing or planned external streets encourages people to walk instead of drive and reduces VMT.[86]

Thus, in response to Criterion 2, the Project would not exceed the assumptions utilized in preparing the AQMP; and, therefore, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

Based on the above analysis, the Project would not conflict with applicable air quality policies of the General Plan's Air Quality Element. Therefore, impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding the Project's consistency with applicable air quality plans would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding the Project's consistency with applicable air quality plans were determined to be less than significant without mitigation. Therefore, no mitigation

83 California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, 2010, pages 162-166.
84 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010, pages 167-170.
85 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010, pages 171-175.
86 CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010, pages 186-189.

measures were required or included, and the impact level remains less than significant.

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

The Project would result in the emission of criteria pollutants for which the Project area is in non-attainment during both construction and operation. The Air Basin is currently in non-attainment for ozone (NAAQS and CAAQS), PM10 (CAAQS), and PM2.5 (NAAQS and CAAQS). According to SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.[87]

(1) Impact Analysis

(a) Construction

Construction of the Project has the potential to generate temporary regional criteria pollutant emissions through the operation of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities such as the application of paint and other surface coatings. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NOx, would result from the use of construction equipment such as dozers and loaders. 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.[88]

The maximum daily construction emissions for the Project were estimated for each construction phase. Some individual construction phases could potentially overlap; therefore, the estimated maximum daily emissions include these potential overlaps by combining the relevant construction phase emissions. The maximum daily emissions are predicted values for a representative worst-case day, and do not represent the actual emissions that would occur for every day of construction, which would likely be lower on many days.

The results of the criteria pollutant calculations are presented in **Table IV.A-6**, ***Estimated Maximum Regional Construction Emissions (Pounds Per Day)***.

87 SCAQMD, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, Appendix D, 1993, page D-3.

88 Impacts from asbestos and lead-based paint from Project demolition are expected to be less than significant and less than significant after implementation of mitigation measures, respectively. For additional details please refer to **Section IX, *Hazards and Hazardous Materials***, in the Initial Study, which is contained in Appendix A of this Draft EIR.

The calculations in Table IV.A-6 incorporate compliance with applicable dust control measures required to be implemented during each phase of construction by SCAQMD Rule 403 (Control of Fugitive Dust), and fugitive VOC control measures required to be implemented by architectural coating emission factors based on SCAQMD Rule 1113 (Architectural Coatings).

TABLE IV.A-6
ESTIMATED MAXIMUM REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Source	VOC	NOx	CO	SO_2	PM10[a]	PM2.5[a]
On-site Construction Activities						
2021						
Demolition	4	40	34	<1	3	2
Site Preparation	1	9	11	<1	1	<1
Grading	3	39	26	<1	3	2
Drainage/Utilities/Sub-Grade	1	13	16	<1	1	1
Building Construction	4	31	49	<1	6	3
Foundations	1	9	10	<1	1	1
2022						
Building Construction	3	29	47	<1	6	3
2023						
Building Construction	3	26	46	<1	6	2
Architectural Coating	14	2	3	<1	<1	<1
Paving	1	12	17	<1	1	1
Overlapping Phases						
2021						
Building Construction/Foundations	5	41	59	<1	7	3
2023						
Building Construction/Architectural Coating/Paving	18	40	67	<1	7	3
Maximum Daily Emissions	**18**	**41**	**67**	**<1**	**7**	**3**
SCAQMD Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2020.

As shown in Table IV.A-6, construction-related daily emissions would not exceed the SCAQMD significance thresholds. **Therefore, as the Project's construction emissions would not exceed the SCAQMD significance thresholds, the Project's construction impacts would be less than significant.**

(b) Operation

Operation of the Project has the potential to generate regional criteria pollutant emissions through mobile sources such as vehicle trips from patrons and employees and delivery trucks traveling to and from the Project Site, and through area (consumer products, architectural coatings, and landscaping) and energy sources (natural gas). Mobile, stationary, and area source operational regional criteria pollutant emissions were calculated for the Project's full buildout year. Reductions in building energy and resource consumption due to physical and operational Project characteristics for which sufficient data is available to enable quantification have been included in the quantitative analysis, and include, but are not limited to, characteristics such as the installation of energy efficient appliances and reduced building energy usage sufficient to meet the 2019 Title 24-standards. Operational emission estimates include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings.

Daily trip generation rates and VMT for the Project were provided by the Project Transportation Assessment and include trips associated with the proposed office, and retail space/restaurants, and the TDM program, which is designed to reduce Project-related VMT.[89] The VMT estimate takes into consideration the Project's locational characteristics, as an infill project near transit, discussed previously.

Natural gas usage factors are based on commercial data from the California Energy Commission, and landscape equipment emissions are based on off-road emission factors from CARB. Emissions from the use of consumer products and the reapplication of architectural coatings are based on data provided in CalEEMod.

The results of the regional criteria pollutant emission calculations for VOC, NOx, CO, SO_X, PM10, and PM2.5 are presented in **Table IV.A-7, *Estimated Maximum Regional Operational Emissions (Pounds Per Day)*.**

As shown in Table IV.A-7, the Project's operational-related daily emissions would not exceed the SCAQMD significance thresholds. For the purposes of estimating maximum daily emissions; the emergency generator would only emit emissions during maintenance and testing operations where maintenance and testing would not occur daily, but rather periodically and it is estimated that the emergency generator would operate for up to one hour in a day for maintenance and testing purposes. **Therefore, as the Project's operational emissions would not**

89 Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

exceed the SCAQMD significance thresholds, the Project's operational impacts would be less than significant.

TABLE IV.A-7
ESTIMATED MAXIMUM REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)

Source	VOC[a]	NOx	CO	SO_2	PM10	PM2.5
Existing						
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	1	2	7	<1	2	<1
Total Existing	**1**	**2**	**7**	**<1**	**2**	**<1**
Project						
Area (Coating, Consumer Products, Landscaping)	3	<1	<1	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Emergency Generator	<1	<1	2	<1	<1	<1
Charbroiler	<1	<1	<1	<1	<1	<1
Mobile	7	12	64	<1	19	5
Total Project	**11**	**13**	**67**	**<1**	**19**	**5**
Net Increase						
Area (Coating, Consumer Products, Landscaping)	3	<1	<1	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Emergency Generator	<1	<1	2	<1	<1	<1
Charbroiler	<1	<1	<1	<1	<1	<1
Mobile	6	11	58	<1	17	5
Net Total Regional Emissions	**10**	**11**	**60**	**<1**	**18**	**5**
SCAQMD Significance Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

[a] Area source VOC emissions are primarily emitted by consumer product usage as estimated in CalEEMod.

SOURCE: ESA, 2020.

(2) Mitigation Measures

Impacts regarding regional construction and operational emissions would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding regional construction and operational emissions 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 (c): Would the project expose sensitive receptors to substantial pollutant concentrations?

(1) Impact Analysis

(a) Localized Emissions

(i) Construction

As explained above, the localized construction air quality analysis was conducted using the methodology prescribed in SCAQMD's Final Localized Significance Threshold Methodology including using the screening criteria to determine localized construction emissions thresholds for the Project.[90] The maximum daily localized emissions for each of the construction phases and the localized significance thresholds are presented in **Table IV.A-8, *Estimated Maximum Localized Construction Emissions (Pounds Per Day)***.

As shown in Table IV.A-8, the Project's maximum localized construction emissions would be below the localized screening thresholds for all analyzed criteria pollutants except PM2.5. **As the Project's maximum localized construction emissions would exceed the localized thresholds for PM2.5, construction emissions impacts to sensitive receptors would be potentially significant.**

90 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 and revised July 2008.

TABLE IV.A-8
ESTIMATED MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Source	NOx	CO	PM10[a]	PM2.5[a]
ON-SITE CONSTRUCTION ACTIVITIES				
2021				
Demolition	37	33	2	2
Site Preparation	8	10	<1	<1
Grading	21	21	1	1
Drainage/Utilities/Sub-Grade	13	15	1	1
Building Construction	29	34	2	2
Foundations	8	9	<1	<1
2022				
Building Construction	27	34	1	1
2023				
Building Construction	25	34	1	1
Architectural Coating	2	2	<1	<1
Paving	11	17	1	1
OVERLAPPING PHASES				
2021				
Building Construction/Foundations	37	43	2	2
2023				
Building Construction/Architectural Coating/Paving	38	53	2	2
Maximum Localized (On-Site) Emissions	**38**	**53**	**2**	**2**
SCAQMD Screening Significance Thresholds[b]	**77**	**422**	**3**	**2**
Exceed Screening Significance Thresholds?	No	No	No	**Yes**

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. The derivations of the localized significance thresholds are also provided in Appendix B of this Draft EIR.

[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

[b] The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal Los Angeles County) for a 0.75-acre site with sensitive receptors conservatively assumed to be located adjacent to the Project Site for construction emissions of NOx, CO, PM10, and PM2.5 for LST purposes.

SOURCE: ESA, 2020.

(ii) Operation

The localized operational air quality analysis was conducted using the methodology prescribed in SCAQMD's Localized Significance Threshold Methodology including using the screening criteria to determine the localized

operational emissions numerical indicators of significance for the Project. The same assumptions, including compliance with the Title 24 Building Energy Efficiency Standards, CALGreen Code, and City of Los Angeles Green Building Code. The maximum daily localized emissions and the localized significance thresholds are presented in Table IV.A-9.

TABLE IV.A-9
ESTIMATED NET MAXIMUM LOCALIZED OPERATIONAL EMISSIONS FOR EXISTING SENSITIVE RECEPTORS (POUNDS PER DAY)

Source	NOx	CO	PM10	PM2.5
Existing				
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Total Existing	**1**	**1**	**<1**	**<1**
Project				
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	<1
Energy	1	1	<1	<1
Emergency Generator	<1	2	<1	<1
Charbroiler	<1	<1	<1	<1
Total Project	**1**	**2**	**<1**	**<1**
Net Increase				
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	<1
Energy	<1	<1	<1	<1
Emergency Generator	<1	2	<1	<1
Charbroiler	<1	<1	<1	<1
Net Project Localized (On-Site) Emissions	**1**	**2**	**<1**	**<1**
SCAQMD Screening Significance Thresholds b	**77**	**422**	**1**	**1**
Exceeds Screening Significance Thresholds?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

[b] The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal Los Angeles County) for a 0.76-acre site with sensitive receptors conservatively assumed to be located adjacent to the Project Site for operational emissions of NOx, CO, PM10, and PM2.5 for LST purposes.

SOURCE: ESA, 2020.

As shown in Table IV.A-9, the Project's maximum localized operational emissions would be below the localized significance thresholds. **As the Project's maximum localized operational emissions would not exceed the localized thresholds**

for NOx, CO, PM10, or PM2.5, operational emissions impacts to sensitive receptors would be less than significant.

(b) Carbon Monoxide Hotspots

The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the threshold one-hour and eight-hour ambient air quality standards (CAAQS) of 20 or 9.0 ppm, respectively, within one-quarter mile of a sensitive receptor, and that no further CO analysis is warranted or required.

As shown previously in Table IV.A-3, CO levels in the Project Site area are substantially below the federal and the State standards. Maximum CO levels in recent years were 2.2 ppm (one-hour average) and 1.3 ppm (eight-hour average) as compared to the criteria of 20 ppm (CAAQS one-hour average) or 35 ppm (NAAQS one-hour average) and 9.0 ppm (CAAQS and NAAQS eight-hour average). No exceedances of the CO standards have been recorded at monitoring stations in the Air Basin for some time, and the Air Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS.[91]

SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin, including: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP CO attainment demonstration, SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.[92] Relevant information from the 2003 AQMP CO attainment demonstration relied upon in this assessment is provided in Appendix B of this Draft EIR. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions (i.e., excluding background concentrations) at these four

91 SCAQMD, 2012 Air Quality Management Plan, February 2013, page 2-22.

92 SCAQMD, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, August 2003, page V-4-24.

intersections was 4.6 ppm (one-hour average) and 3.2 ppm (eight-hour average) at Wilshire Boulevard and Veteran Avenue.[93]

Based on the Project's Transportation Assessment, under Future plus Project, the intersection of La Cienega Boulevard and Wilshire Boulevard would have a maximum traffic volume of approximately 60,200 ADT.[94,95] As a result, CO concentrations from the Project's maximum traffic volume at the intersection identified above plus the measured background level in the Project Site area are expected to be approximately 5.0 ppm (one-hour average) and 3.2 ppm (eight-hour average), which would not exceed the numerical thresholds of significance. Total traffic volumes at the maximally impacted intersection would likely have to five times higher to cause or contribute to a CO hotspot impact, given that vehicles operating today have reduced CO emissions as compared to vehicles operating in year 2003 when SCAQMD conducted the AQMP attainment demonstration modeling.[96] This comparison demonstrates that the Project would not contribute to the formation of CO hotspots and that no further CO analysis is required. **Therefore, as the Project would not contribute to the formation of CO hotspots, the Project would result in less-than-significant impacts with respect to CO hotspots.**

(c) Toxic Air Contaminant Emissions

(i) Construction

Temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase of the Project. According to the 2003 OEHHA guidance manual, health effects from TACs for sensitive residential receptors are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary and short-term construction schedule (approximately 34 months), the Project would not result in a long-term (i.e., lifetime or 70-year) exposure as a result of Project construction.

As discussed above under Threshold (a), the Project would be consistent with the applicable 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment

93 The eight-hour average is based on a 0.7 persistence factor, as recommended by SCAQMD.

94 Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

95 The traffic volume of approximately 40,110 was estimated based on the peak hour intersection volumes under future with Project conditions and the general assumption that peak hour trips represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption; see http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm).

96 SCAQMD, 2003 Air Quality Management Plan, Chapter 6 Clean Air Act Requirements, August 2003.

and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Furthermore, the Project would comply with fleet rules to reduce on-road truck emissions (i.e., 13 CCR, Section 2025 (CARB Truck and Bus regulation)).

Based on the above analysis, impacts related to TAC emissions during construction would be less than significant. In addition, with incorporation of Mitigation Measure AIR-MM-1, as required to reduce localized emission impacts during construction as described in the analysis above, the Project would be required to utilize off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards and/or incorporate alternative fuel vehicles into its construction fleet. This would substantially reduce TAC emissions, in the form of DPM emissions, from construction equipment. The Tier 4 standards reduce DPM emissions by approximately 81 to 96 percent as compared to equipment that meet the Tier 2 off-road emissions standards, depending on the specific horsepower rating of each piece of equipment.[97] Implementing alternative fuel vehicles, such as electric or CNG, remove all DPM emissions associated with those vehicles. **Therefore, Project construction activities would not expose sensitive receptors to substantial toxic air contaminant concentrations and thus result in less than significant impacts. These effects would be further reduced with implementation of Mitigation Measure AIR-MM-1.**

(ii) Operation

Project operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities. Trucks are required to comply with applicable provisions of the CARB Truck and Bus regulation to minimize and reduce PM and NOx emissions from existing diesel trucks. Therefore, the Project operations would not be considered a substantial source of diesel particulates.

In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings and other products. Area sources that would generate TAC emissions include charbroiling activities associated with the restaurant uses and consumer products associated with re-applying architectural coatings and cleaning building surfaces. Charbroiling has the potential to generate small amounts of chemicals that are known or suspected by the State of California to cause human health impacts. However, restaurants in the Air Basin incorporating charbroiling would be

97 CAPCOA, CalEEMod User's Guide For CalEEMod Version 2016.3.2, Appendix D, September 2016, page D-77.

required to comply with SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations), which requires the installation of emissions controls on charbroilers. The emissions controls would reduce the already small amounts of TAC emissions associated with charbroiling, such that charbroiling would not cause or contribute to adverse health impacts at nearby sensitive receptors. It is anticipated that one emergency generator would be implemented onsite, which would be required to comply with SCAQMD's Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines). The purpose of Rule 1470 is to control and limit emissions of TACs from emergency generators and similar equipment. In accordance with Rule 1470, emissions from maintenance and testing would not occur daily, but rather periodically, up to 50 hours per year. Furthermore, the emergency generator would be certified to the most stringent CARB and USEPA Tier 4 emissions standards, and emissions minimized to the lowest technically feasible level for equipment of this size and type. Compliance with Rule 1470 and the Tier 4 standards would ensure the TAC emissions from the emergency generator installed onsite would not cause or contribute to adverse health impacts at nearby sensitive receptors.

With respect to the use of consumer products and architectural coatings, the medical office and retail/restaurant uses associated with the Project would be expected to generate minimal emissions from these sources. The Project's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD significance threshold. **Therefore, as operation of the Project would not expose sensitive receptors to substantial TAC concentrations, operational impacts would be less than significant.**

(2) Mitigation Measures

(a) Construction

Impacts regarding CO Hot Spot and TAC construction emissions would be less than significant. Therefore, no mitigation measures are required.

Without mitigation, construction impacts could result in significant impacts related to localized construction emissions of PM2.5. The following mitigation measure would reduce these impact(s) to a less than significant level.

- **AIR-MM-1:** The Applicant will implement the following construction equipment features for equipment operating at the Project Site. These features will be included in applicable bid documents, and successful contractor(s) must

demonstrate the ability to supply such equipment. Construction features will include the following:

- For off-road diesel-powered construction equipment rated greater than 50 horsepower: the equipment shall meet or exceed the CARB and USEPA Tier 4 off-road emissions standards or greater during Project construction or shall be fitted with an emissions control device that achieves diesel emissions reductions that are no less than what could be achieved by an EPA Tier 4 Final engine.
- The Project Applicant shall implement the use of alternatively fueled equipment to the extent feasible for equipment greater than 50 horsepower. Equipment less than 50 horsepower shall be electric plug-in, solar-powered, or alternative fueled (i.e., non-diesel). Pole power shall be made available for use of electric tools, equipment, lighting, etc. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.
- Alternative-fueled generators will be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors, and on-site electrical power is not available. The determination of the commercial availability of such equipment will be made by the City prior to the issuance of grading or building permits based on Applicant-provided evidence of the availability or unavailability of alternative-fueled generators and/or evidence obtained by the City from expert sources such as construction contractors in the region.
- A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with California Air Resources Board's Rule 2449.

(b) Operations

Impacts regarding the exposure of substantial pollutant concentrations on sensitive receptors during operation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

(a) Construction

With the exception of localized construction emissions of PM2.5, impacts regarding CO Hot Spot and TAC construction emissions would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

With implementation of Mitigation Measure AIR-MM-1, localized construction emissions would be reduced to below the significance thresholds, as shown in Table IV.A-10. Impacts would be mitigated to less than significant.

TABLE IV.A-10
ESTIMATED MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)

Source	NOx	CO	PM10[a]	PM2.5[a]
ON-SITE CONSTRUCTION ACTIVITIES				
2021				
Demolition	4	30	<1	<1
Site Preparation	2	11	<1	<1
Grading	4	29	<1	<1
Drainage/Utilities/Sub-grade	2	17	<1	<1
Building Construction	4	37	<1	<1
Foundations	3	9	<1	<1
2022				
Building Construction	4	37	<1	<1
2023				
Building Construction	4	37	<1	<1
Architectural Coating	<1	2	<1	<1
Paving	1	20	<1	<1
OVERLAPPING PHASES				
2021				
Building Construction/Foundations	7	46	<1	<1
2023				
Building Construction/Architectural Coating/Paving	5	59	<1	<1
Maximum Localized (On-Site) Emissions	**7**	**59**	**<1**	**<1**
SCAQMD Screening Significance Thresholds[b]	**77**	**422**	**3**	**2**
Exceed Screening Significance Thresholds?	No	No	No	No

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. The derivations of the localized significance thresholds are also provided in Appendix B of this Draft EIR.

[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

[b] The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal Los Angeles County) for a 0.75-acre site with sensitive receptors conservatively assumed to be located adjacent to the Project Site for construction emissions of NOx, CO, PM10, and PM2.5 for LST purposes.

SOURCE: ESA, 2020.

(b) Operations

Impacts regarding the exposure of substantial pollutant concentrations on sensitive receptors during operations were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

As discussed in **Chapter VI, *Other CEQA Considerations***, and in the Initial Study, in Appendix A of this Draft EIR, activities and materials associated with Project construction would be typical of construction projects of similar type and size. In addition, odors associated with Project operation would be limited to those associated with on-site waste generation and disposal (e.g., trash cans, dumpsters); waste would be regularly collected and any potential odors from on-site waste disposal would not affect surrounding land uses as the waste collection area would be completely enclosed and would shield the surrounding sensitive receptors from any noise from loading/unloading and refuse operations. In addition, shown in Table IV.A-7 through Table IV.A-10, construction and operational emissions would not exceed the SCAQMD regional or localized significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). As such, the Project would not result in other emissions (such as those leading to odors) affecting a substantial number of people. **Therefore, impacts would be less than significant.**

e) Cumulative Impacts

Based on the established methodology to analyze cumulative impacts, Project-level impacts are considered when determining cumulative impacts, as detailed below.

(1) Impact Analysis

The City has identified a number of related projects located in the Project Site area that have not yet been built or that are currently under construction. The nearest related projects in the City of Los Angeles are 6401-6419 Wilshire Boulevard (approximately 750 feet from the Project Site), which began construction in 2019 and is undergoing vertical building construction as of December 2020, and 488 South San Vicente Boulevard (approximately 1,600 feet from the Project Site), which has been approved but is not yet under construction as of December 2020.[98] The nearest related project in the City of Beverly Hills is 55 North La Cienega

98 City of Los Angeles, 488 S San Vicente Blvd, ENV-2016-2204-CE, Notice of Exemption, Filed March 21, 2018.

Boulevard (approximately 1,350 feet from the Project Site), which has not yet been approved and environmental documentation pursuant to CEQA has not yet been filed as of December 2020.[99] In addition, there is one infrastructure project, the Metro Purple Line Extension (approximately 150 feet from the Project Site).[100]

The SCAQMD has not adopted guidance that recommends aggregating emissions from multiple projects and has not adopted numerical significance thresholds applicable to aggregated emissions from multiple projects. Therefore, such quantifications do not provide meaningful information related to their adopted thresholds. Rather, the SCAQMD recommends using two methodologies to assess the cumulative impact of air quality emissions: (1) project-specific air quality impacts be used to determine a project's potential cumulative impacts to regional air quality; or (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.[101]

As stated in the 2006 L.A. CEQA Thresholds Guide, the "City of Los Angeles has not adopted specific Citywide significance thresholds for air quality impacts. However, because of the SCAQMD's regulatory role in the Air Basin, the 2006 L.A. CEQA Thresholds Guide references the screening criteria, significance thresholds and analysis methodologies in the CEQA Air Quality Handbook to assist in evaluating projects proposed within the City."[102] The SCAQMD CEQA Air Quality Handbook states that the "Handbook is intended to provide local governments, project proponents, and consultants who prepare environmental documents with guidance for analyzing and mitigating air quality impacts of projects."[103] The SCAQMD CEQA Air Quality Handbook also states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District."[104] The SCAQMD has also provided

99 City of Beverly Hills, Current Development Activity Projects List (Planning Commission/City Council), 55 N La Cienega Blvd. (Stinking Rose site), December 2, 2020.

100 Los Angeles County Metropolitan Transportation Authority (Metro), Westside Subway Extension, Final Environmental Impact Statement/Environmental Impact Report, March 2012.

101 SCAQMD, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, Appendix D, 1993, page D-3 ("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.").

102 City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, 2006, page B-1.

103 SCAQMD, CEQA Air Quality Handbook, April 1993, page iii.

104 SCAQMD, CEQA Air Quality Handbook, April 1993, page 6-1.

guidance on an acceptable approach to addressing the cumulative impacts issue for air quality as discussed below:[105]

> *"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."*

The City has determined to rely on thresholds established by the SCAQMD (refer to CEQA Guidelines Section 15064.7) to assess the Project's cumulative impacts. While it may be possible to add emissions from the list of related projects with the Project, it would not provide meaningful data for evaluating cumulative impacts under CEQA because neither the City nor the SCAQMD have established numerical thresholds applicable to the summation of multiple project emissions for comparison purposes. Additionally, regional emissions from a project have the potential to affect the Air Basin as a whole, and, unlike other environmental issues areas, such as aesthetics or noise, it is not possible to establish a geographical radius from a specific project site where potential cumulative impacts from regional emissions would be limited. Meteorological factors, such as wind, can disperse pollutants, often times tens of miles downwind from a project site. Therefore, consistent with accepted and established SCAQMD cumulative impact evaluation methodologies, the potential for the Project to result in cumulative impacts from regional emissions is assessed based on the SCAQMD thresholds.

(a) Project-Specific Impacts

For construction, as shown previously in Table IV.A-6, regional construction emissions would not exceed regional significance thresholds. However, localized PM2.5 emissions would exceed the SCAQMD threshold. As discussed under Threshold (c), TAC emissions would not result in significant impacts to sensitive receptors with implementation of Mitigation Measure AIR-MM-1. **Therefore, the Project's contribution to cumulative impacts related to regional and TAC construction emissions would not be cumulatively considerable. However, cumulative impacts related to localized construction PM2.5 emissions would be potentially significant.**

For operations, as shown previously in Table IV.A-7 and Table IV.A-9, the Project's regional and localized emissions would not result in an exceedance of regional and localized significance thresholds, respectively. **Therefore, the**

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

Project's contribution to cumulative impacts related to regional, localized, and TAC operational emissions would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

(b) Consistency with Air Quality Management Plan

SCAQMD recommends assessing a project's cumulative impacts based on whether the project is consistent with the current AQMP. CEQA Guidelines Section 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency …"*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's cumulative air quality impacts are determined not to be significant based on its consistency with the SCAQMD's adopted 2016 AQMP, as discussed above under Threshold (a). As is also discussed above, the Project's increase in population, housing, and employment would also be consistent with the 2016–2040 RTP/SCS growth projections, upon which the 2016 AQMP is based. Related projects would also be required to assess consistency with 2016 AQMP transportation control strategies, as well as with population, housing, and employment growth projections in the 2016–2040 RTP/SCS and provide mitigation measures if significant impacts are identified. **As such, the Project would be consistent with and would not conflict with or obstruct implementation of the 2016 AQMP and the Project's contribution to cumulative impacts with respect to AQMP consistency would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.**

(2) Mitigation Measures

(a) Construction

Cumulative impacts regarding regional emissions, CO Hot Spot, and TAC construction emissions would be less than significant. Therefore, no mitigation measures are required.

Refer to Mitigation Measure AIR-MM-1 to reduce cumulative localized PM2.5 emissions. No additional mitigation measures are required.

(b) Operations

Cumulative impacts regarding operational air quality emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

(a) Construction

Cumulative impacts regarding regional emissions, CO Hot Spot, and TAC construction emissions 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.

Implementation of Mitigation Measure AIR-MM-1 would significantly reduce localized PM2.5 emissions associated with construction phasing. As shown in Table IV.A-10, emissions of localized PM2.5 are reduced to less than one pound per day, which is below the threshold of two pounds per day. Cumulative air quality impacts would be less than significant with mitigation. When considered together with related projects, air quality impacts would not result in a cumulatively considerable impact after mitigation.

(b) Operations

Cumulative impacts regarding operational air quality emissions were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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