IV. Environmental Impact Analysis

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A. Air Quality

1. Introduction

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Project and evaluates whether the Project would conflict with or obstruct implementation of any applicable air quality plan; result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions, such as those leading to odors, affecting a substantial number of people. This section relies on calculation worksheets, assumptions, and model outputs prepared by Eyestone Environmental, which are included in the Air Quality and Greenhouse Gas Technical Appendix, provided in Appendix B of this Draft EIR.[1]

2. Environmental Setting

a. Air Quality Background

(1) Air Quality and Public Health

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and to facilitate improvement in air quality. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations, such as asthmatics, children, and the elderly with a margin of safety, and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.[2] As the scientific methods for the study of air pollution health

[1] Eyestone Environmental, Air Quality and Greenhouse Gas Technical Appendix, February 2022.

[2] USEPA, NAAQS Table, www.epa.gov/criteria-air-pollutants/naaqs-table, accessed December 16, 2021.

effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. New findings over time have, in turn, led to the revision and lowering of NAAQS which, in the judgment of the U.S. Environmental Protection Agency (USEPA), are necessary to protect public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to federal and state air quality standards.[3] The NAAQS and CAAQS are listed in Table IV.A-1 on page IV.A-3.

At the regional level, the South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino Counties, including the Coachella Valley.[4] 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 (TACs).

(2) Local Air Quality and Air Pollution Sources

As mentioned above, the City of Los Angeles is located within the South Coast 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

[3] SCAQMD, Final 2016 AQMP, 2017, Appendix I, Health Effects, p. I-69.

[4] SCAQMD, Map of Jurisdiction, 1999.

Table IV.A-1
Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
Ozone (O_3)	1 hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8 hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM_{10})	24 hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter ($PM_{2.5}$)	24 hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	12 µg/m^3	12 µg/m^3		
Carbon Monoxide (CO)	1 hour	35 ppm (40 mg/m^3)	20 ppm (23 mg/m^3)	Attainment	Attainment
	8 hour	9 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	1 hour	0.10 ppm (188 µg/m^3)	0.18 ppm (339 µg/m^3)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)		
Sulfur Dioxide (SO_2)	1 hour	0.075 ppm (196 µg/m^3)	0.25 ppm (655 µg/m^3)	Unclassified/ Attainment	Attainment
	3 hour	0.5 ppm (1,300 µg/m^3)	—		
	24 hour	0.14 ppm (365 µg/m^3)	0.04 ppm (105 µg/m^3)		
	Annual	0.03 ppm (80 µg/m^3)	—		
Lead (Pb)	30-day average	—	1.5 µg/m^3	Partial Non-Attainment[e]	Attainment
	Rolling 3-month average	0.15 µg/m^3	—		
Sulfates	24 hour	—	25 µg/m^3	—	Attainment
Hydrogen Sulfide (H_2S)	1 hour	—	0.03 ppm (42 µg/m^3)	—	Unclassified

ppm = parts per million by volume

µg/m^3 = micrograms per cubic meter

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

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

Pollutant	Averaging Period	Federal Standard[a,b]	California Standard[a,b]	South Coast Air Basin Attainment Status[c]	
				Federal Standard[d]	California Standard[d]
concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.					
[b] *Ambient Air Quality Standards based on the 2016 AQMP.*					
[c] *"Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.*					
[d] *California and Federal standard attainment status based on SCAQMD's 2016 AQMP and 2018 updates from CARB, ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.*					
[e] *An attainment re-designation request is* pending.					
Source: United States Environmental Protection Agency, NAAQS Table, www.epa.gov/criteria-air-pollutants/naaqs-table, accessed December 16, 2021; CARB, Ambient Air Quality Standards, May 4, 2016.					

addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

The Air Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of 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

(1) 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 (PM_{10} and $PM_{2.5}$, respectively), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted for them.

(i) Ozone (O_3)

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

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

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter, PM_{10} and $PM_{2.5}$, consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, such as pollen and windstorms, are naturally occurring. However, in areas such as 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 PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

(iii) Carbon Monoxide (CO)

CO is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. In urban areas, such as the City 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)

NO_2 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, particularly in urban areas, such as the City of

Los Angeles, may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. NO_X 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 Pb in the air are usually found near Pb smelters. The major sources of Pb emissions in the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Pb is also emitted from the sanding or removal of old lead-based paint (LBP). Pb emissions are primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

(b) Additional Criteria Pollutants (California Only)

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

A description of the health effects of the state-identified criteria air pollutants is provided below.

(i) Sulfates (SO_4^2)

SO_4^2 are the fully oxidized ionic form of sulfur. SO_4^2 occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to SO_4^2 in the atmosphere. Effects of 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. SO_4^2 are particularly effective in degrading visibility and, due to the fact that they are usually acidic, can harm ecosystems and damage materials and property.

(ii) Hydrogen Sulfide (H_2S)

H_2S is a colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing and natural emissions from geothermal fields. Industrial sources of H_2S include petrochemical plants and kraft paper mills. H_2S is also formed during bacterial decomposition of human and animal wastes and is present in emissions from sewage treatment facilities and landfills.[5] Exposure to H_2S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.[6] 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.[7]

(iii) Visibility-Reducing Particles

Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., SO_4^2, nitrates, organic carbon

5 California Air Resources Board, Hydrogen Sulfide & Health, 2019.

6 California Air Resources Board, Hydrogen Sulfide & Health, 2019.

7 California Air Resources Board, Hydrogen Sulfide & Health, 2019.

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.[8] Exposure to some haze-causing pollutants have been linked to adverse health impacts similar to PM_{10} and $PM_{2.5,}$ as discussed above.[9]

(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.[10] 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.[11] Most health data on vinyl chloride relate to carcinogenicity; thus, the people most at risk are those who have long-term exposure to elevated levels, which is more likely to occur in occupational or industrial settings. However, control methodologies applied to industrial facilities generally prevent emissions to the ambient air.[12]

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

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

(i) VOCs

VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, VOCs are a prime component (along with NO_X) of the photochemical

8 California Air Resources Board, Visibility-Reducing Particles and Health, last reviewed October 11, 2016.

9 California Air Resources Board, Visibility-Reducing Particles and Health, last reviewed October 11, 2016.

10 California Air Resources Board, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed December 16, 2021.

11 California Air Resources Board, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed December 16, 2021.

12 California Air Resources Board, Vinyl Chloride & Health, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed December 16, 2021.

processes by which such criteria pollutants as O_3, NO_2, and certain fine particles are formed. They are, therefore, regulated as "precursors" to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings, etc.).

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

b. Regulatory Framework

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

- Federal Clean Air Act
  - National Ambient Air Quality Standards
- California Clean Air Act
  - California Ambient Air Quality Standards
- California Code of Regulations
- State Programs for Toxic Air Contaminants
- Diesel Risk Reduction Program

- South Coast Air Quality Management District
  - Air Quality Management Plan and Regional Transportation Plan/Sustainable Communities Strategy
  - Air Quality Guidance Documents
  - Rules and Regulations
- City of Los Angeles Air Quality Element
- City of Los Angeles Plan for a Healthy LA

(1) Federal

(a) Federal Clean Air Act

The Federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the latest amendments occurring in 1990.[13] The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.[14] The USEPA is responsible for the implementation and enforcement of the CAA, which establishes the NAAQS, specifies future dates for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).[15]

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

Title II pertains to mobile sources, which includes on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the

13 42 United States Code §7401 et seq., 1970.

14 USEPA, Clean Air Act, 1963.

15 USEPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, last updated January 3, 2017.

mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

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

(2) State

(a) California Clean Air Act

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

(b) California Code of Regulations

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

(c) State Programs for Toxic Air Contaminants

The California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to

toxic substances in the air. In the risk identification step, CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures, such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment, in order to reduce public exposure to DPM and other TACs. These actions are also supplemented by the Assembly Bill (AB) 2588 Air Toxics "Hot Spots" program and Senate Bill (SB) 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management plan. SCAQMD has further adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

(d) Diesel Risk Reduction Program

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

(3) Regional

(a) South Coast Air Quality Management District

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

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

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The 2016 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O_3 and $PM_{2.5}$ are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions[16] sufficiently to meet the upcoming O_3 standard deadlines as NO_X plays a critical role in the creation of O_3. 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 $PM_{2.5}$, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of $PM_{2.5}$ standards.[17,18]

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.

The AQMP also incorporates the transportation strategy and transportation control measures from SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Plan.[19] 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

16 NO_x emissions are a precursor to the formation of both O_3 and secondary $PM_{2.5}$.

17 Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2016 AQMP for detailed discussion).

18 SCAQMD, Final 2016 AQMP, 2017, p. ES-2.

19 SCAG, Final 2016-2040 RTP/SCS, 2016.

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.[20] The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2016 AQMP, 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, a 16-percent growth in housing units, a 23-percent growth in employment, and an 8-percent growth in VMT 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 local, state, and federal levels.[21]

On September 3, 2020, SCAG's Regional Council adopted the 2020–2045 RTP/SCS. 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 future state GHG reduction targets of 19 percent. The 2020–2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

(i) SCAQMD Air Quality Guidance Documents

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

The SCAQMD has also adopted land use planning guidelines in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, which

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20 SCAQMD, Final 2016 AQMP, 2017, p. ES-2.

21 SCAQMD, Final 2016 AQMP, 2017, Figure 1-4.

22 South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

23 SCAQMD, Air Quality Analysis Guidance, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#, accessed December 16, 2021.

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

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

(ii) SCAQMD Rules and Regulations

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

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

- **Rule 401—Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.

[24] SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, 2005.

[25] SCAQMD, Final Localized Significance Threshold Methodology, June 2003 (Revised July 2008).

[26] SCAQMD, Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds, 2006.

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

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

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

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

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

- **Rule 1146.2—Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters:** This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_X emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.

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

Regulation XIII—New Source Review (NSR): Regulation XIII sets requirements for preconstruction review required under both federal and state statutes for new and

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

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

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. The following is a list of rules, which may apply to the Project:

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

- **Rule 1470—Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition (CI) engines greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

- **Rule 2305—Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program:** This rule requires warehouses greater than 100,000 square feet to directly reduce NO_X and diesel PM, or to facilitate emission and exposure reductions of these pollutants. The WAIRE Program is a menu-based points system that will require warehouse operators to annually earn a specified number of points by completing actions from a menu. Menu items include acquiring or using Near Zero Emissions (NZE) and/or Zero Emissions (ZE)

on-road trucks, ZE cargo handling equipment, ZE charging/fueling infrastructure, solar panels, or particulate filters for nearby sensitive land uses. Alternatively, warehouse operators could prepare and implement a custom plan specific to their site, or they could pay a mitigation fee. Funds from the mitigation fee would be used through future solicitations and Board actions to incentivize the purchase of NZE or ZE trucks and ZE charging/fueling infrastructure in the communities near warehouses that paid the fee. Warehouse owners and operators would also have reporting and recordkeeping requirements.

(4) Local

(a) City of Los Angeles General Plan

(i) Air Quality Element

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. In general, the City of Los Angeles' General Plan (including the Framework, Air Quality, Mobility 2035, and Health and Wellness Elements) and the City of Los Angeles' Green New Deal l Sustainability Plan 2019 (Green New Deal) contain policies and programs for the protection of the environment and health through improved air quality. These serve to provide additional critical guidance for the betterment of public health for the region and the City.

The most directly related of those plans, the 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 land use development and relate to traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupancy vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency in City facilities and private developments.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;

- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;

- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality;

- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implementation of conservation measures, including passive measures, such as site orientation and tree planting; and

- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

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

(ii) 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.

d. Existing Conditions

(1) Regional Air Quality

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot

weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Air Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors, such as wind, sunlight, temperature, humidity, rainfall, and topography, affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential.

The greatest air pollution throughout the Air Basin occurs from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. O_3 concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California. However, the Air Basin still fails to meet the national standards for O_3 and $PM_{2.5}$ and, therefore is considered a federal non-attainment area for these pollutants. In addition, Los Angeles County still fails to meet the national standard for Pb and, therefore, is considered a federal non-attainment area for Pb.

SCAQMD has the responsibility for ensuring that all national and state ambient air quality standards are achieved and maintained throughout the Air Basin. To meet the standards, SCAQMD has adopted a series of AQMPs. The 2016 AQMP includes strategies to ensure that rapidly approaching attainment deadlines are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions sufficiently to meet the upcoming O_3 standard deadlines.[27] The 2016 AQMP provides a baseline year 2012 inventory of 512 tons per day (tpd) of NO_X and modeling results show that NO_X emissions are projected to be 214 tpd in the 8-hour O_3 attainment year of 2031, due to continued implementation of already adopted regulatory actions ("baseline emissions"). The 2016 AQMP suggests that total Air Basin emissions of NO_X must be reduced to 96 tpd by 2031 to attain the 8-hour O_3 standard. Although the existing air regulations and programs will continue to lower NO_X emissions in the region, an additional 55 percent in the year 2031 are necessary to attain the 8-hour O_3 standard.[28,29]

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

[28] Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2016 AQMP for detailed discussion).

[29] SCAQMD, Final 2016 AQMP, 2017, p. ES-2.

The overall control strategy is an integral approach relying on fair-share emission reductions from federal, state and local levels. 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 CARB and USEPA. In addition, SCAG's 2016–2040 RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce VMT, which are contained in the AQMP.[30,31]

Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. SCAQMD combines its portion of the Plan with those prepared by SCAG. The RTP/SCS and Transportation Control Measures (TCMs), included as Appendix IV-C to the 2016 AQMP/SIP for the 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, a 16-percent growth in housing units, a 23-percent growth in employment, and an 8-percent growth in VMT between 2012 and 2031.

Despite this regional growth, air quality has improved substantially over the years, primarily due to the impacts of air quality control programs at the federal, state, and local levels. The graphic included in Figure IV.A-1 on page IV.A-23 shows the percent change in air quality along with demographic data for the four-county region from the 2016 AQMP. In particular, Figure IV.A-1 illustrates the trends since 1990 of the 8-hour O_3 levels, the 1-hour O_3 levels, and annual average $PM_{2.5}$ concentrations (since 1999), compared to the regional gross domestic product, total employment and population. Human activity in the region has an impact on achieving reductions in emissions. However, the O_3 and PM levels continue to trend downward as the economy and population increase, demonstrating that it is possible to maintain a healthy economy, while improving public health through air quality improvements.[32]

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30 SCAG, Final 2016–2040 RTP/SCS, https://scag.ca.gov/resources-prior-plans, accessed December 16, 2021.

31 The SCAG Regional Council adopted the 2020–2045 RTP/SCS, also known as Connect SoCal, on September 3, 2020, and thus, consistency with the 2020–2045 RTP/SCS is analyzed in Section IV.H, Land Use and Planning, of this Draft EIR. However, the 2016 AQMP relies on the 2016–2040 RTP/SCS, which is, therefore, discussed herein.

32 SCAQMD, Final 2016 AQMP, 2017, p. 1-6, www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp, accessed December 16, 2021.

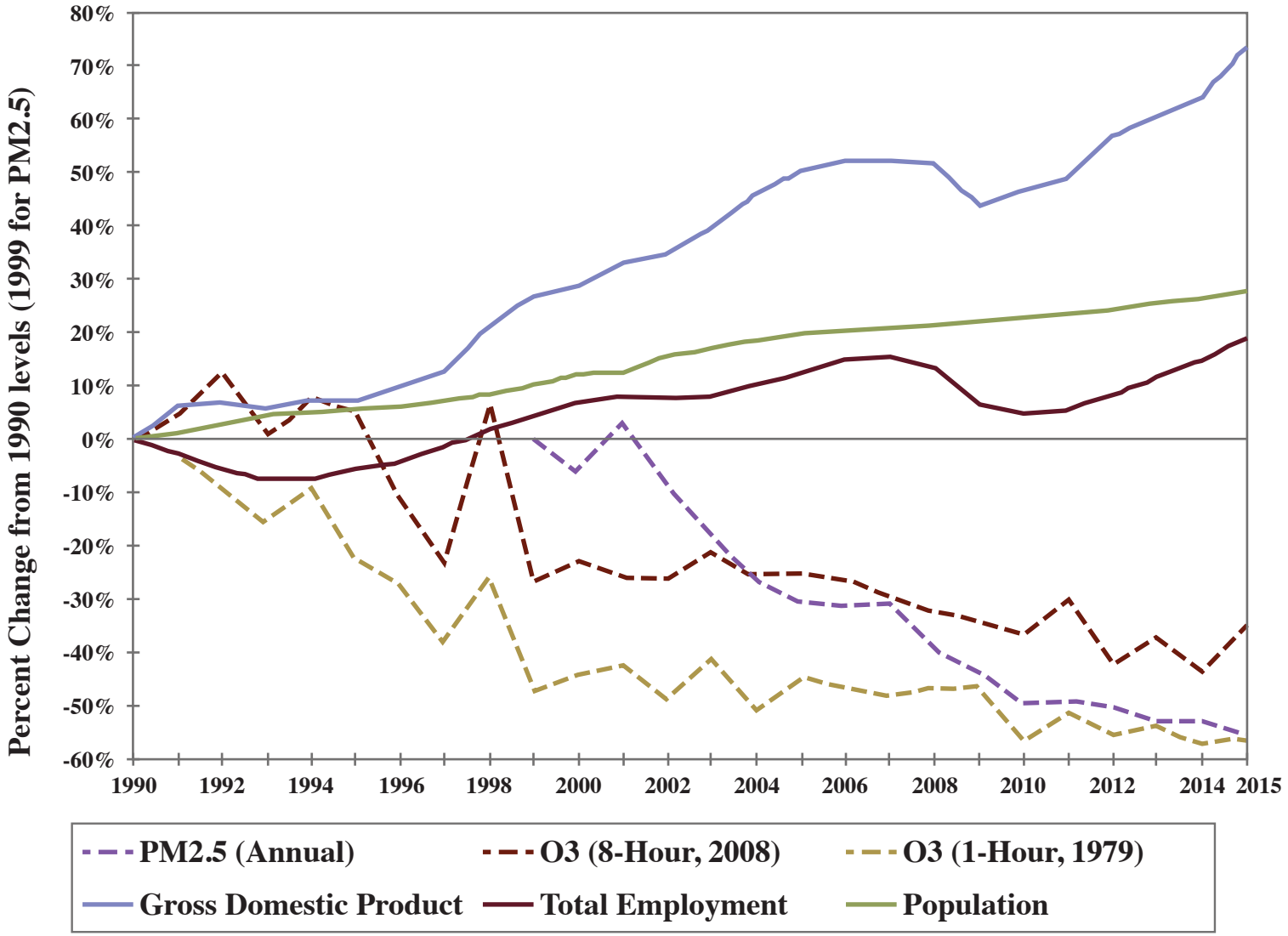

Figure IV.A-1
Ozone Trends

Source: SCAQMD, 2016

SCAQMD has released the Multiple Air Toxics Exposure Study (MATES-V).[33] The MATES-V study was aimed at estimating the cancer risk from toxic air emissions throughout the Air Basin by conducting a comprehensive monitoring program, an updated emissions inventory of TACs, and a modeling effort to fully characterize health risks for those living in the Air Basin. The MATES-V study concluded that the average carcinogenic risk from air pollution in the Air Basin is approximately 424 in one million over a 70-year duration. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 50 percent of the risk is attributed to diesel particulate emissions, approximately 25 percent to other toxics associated with mobile sources (including benzene, butadiene, and carbonyls), and approximately 25 percent of all carcinogenic risk is attributed to stationary sources (which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses, such as gas stations and chrome plating).[34]

As part of the MATES-V study, SCAQMD prepared a series of maps that shows regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The estimates represent the number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years) in parts of the area. The MATES-V map is the most recently available map to represent existing conditions near the Project area, as shown in Figure IV.A-2 on page IV.A-25. The estimated cancer risk for the vast majority of the urbanized area within the Air Basin ranges from 200 to over 1,000 cancers per million over a 70-year duration.[35] Generally, the risk from air toxics is lower near the coastline and higher risks are concentrated near large diesel sources (e.g., freeways, airports, and ports).

(2) Local Air Quality

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

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

34 SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V) Final Report, August 2015.

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

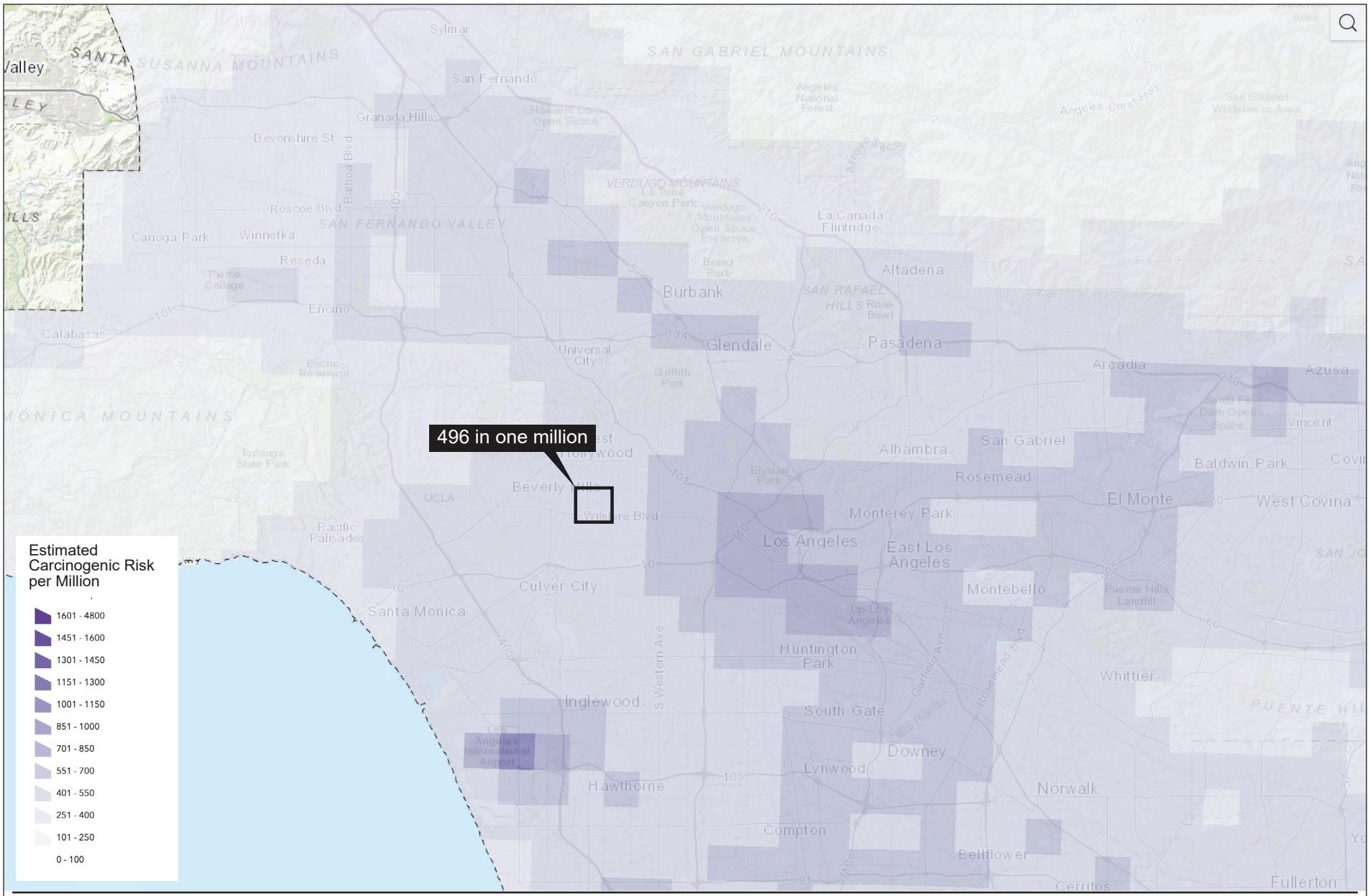

Figure IV.A-2
MATES V Total Cancer Risk for the Project Area

Source: South Coast AQMD, 2021.

(a) Existing Pollutant Levels at Nearby Monitoring Stations

SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin and has divided the Air Basin into 38 source receptor areas (SRAs) in which 31 monitoring stations operate. Figure IV.A-3 on page IV.A-27 shows the locations of the SRAs located in Los Angeles County. The Project Site is located within SRA 1, which covers the Central Los Angeles County area. The monitoring station most representative of the Project Site is the Central Los Angeles Station, located at 1630 North Main Street in Los Angeles, approximately seven miles east of the Project Site. This station currently monitors ambient concentrations of O_3, CO, NO_2, SO_2, Pb, PM_{10}, and $PM_{2.5}$. Hydrogen sulfide H_2S is not monitored at this station. Table IV.A-2 on page IV.A-28 identifies the national and state ambient air quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured at this station through the period of 2018–2020.

(b) Existing Health Risk in the Surrounding Area

As shown in Figure IV.A-2 on page IV.A-25, based on the MATES-V model, the calculated cancer risk in the Project area is approximately 496 in one million.[36] The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., the Hollywood Freeway [US-101] and the Santa Monica Freeway [I-10]). Other sources in the Project vicinity include emergency generators, boilers and charbroilers. In general, the risk at the Project Site is comparable with other urbanized areas in Los Angeles.

The OEHHA, on behalf of the CalEPA, provides a screening tool (CalEnviroScreen) that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site is located in the 75th percentile, which means that the Project Site is worse than average in terms of pollution in comparison to other communities within California.[37]

SCAQMD developed a web tool, which allows one to search for public information about SCAQMD-regulated facilities that are required to have a permit to operate equipment that release pollutants into the air.[38] A search was performed on the SCAQMD's Facility Information Database (FIND) to identify potential air toxic emitting sources (e.g., freeways, diesel trucks idling at warehouse distribution facilities in excess of 100 trucks per day).

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

[37] OEHHA, CalEnviroScreen 4.0 MAP, https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/, accessed December 16, 2021.

[38] SCAQMD, Facility Information Detail (F.I.N.D.), www.aqmd.gov/nav/FIND, accessed December 16, 2021.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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

Air Quality Reporting

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

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

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

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

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

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

General Forecast Areas & Air Monitoring Areas

Coastal

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

Metropolitan

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

San Fernando Valley

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

San Gabriel Valley

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

Inland Orange County

Central Orange County	17
Saddleback Valley	19
Capistrano Valley	21

Riverside Valley

Corona/Norco Area	22
Metropolitan Riverside	23

San Bernardino Valley

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

Hemet/Elsinore Area

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

Temecula/Anza Area

Temecula Valley	26
Anza Area	27

San Gabriel Mountains 15

San Bernardino Mountains

West San Bernardino Mountains	36
Central San Bernardino Mountains	37

Big Bear Lake 38

Banning Pass Area 29

Coachella/Low Desert

Coachella Valley	30
East Riverside County	31

ANTELOPE VALLEY APCD* 14

MOJAVE DESERT AQMD*

Victor Valley	39
Northern Mojave Desert	40
Central Mojave Desert	41

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

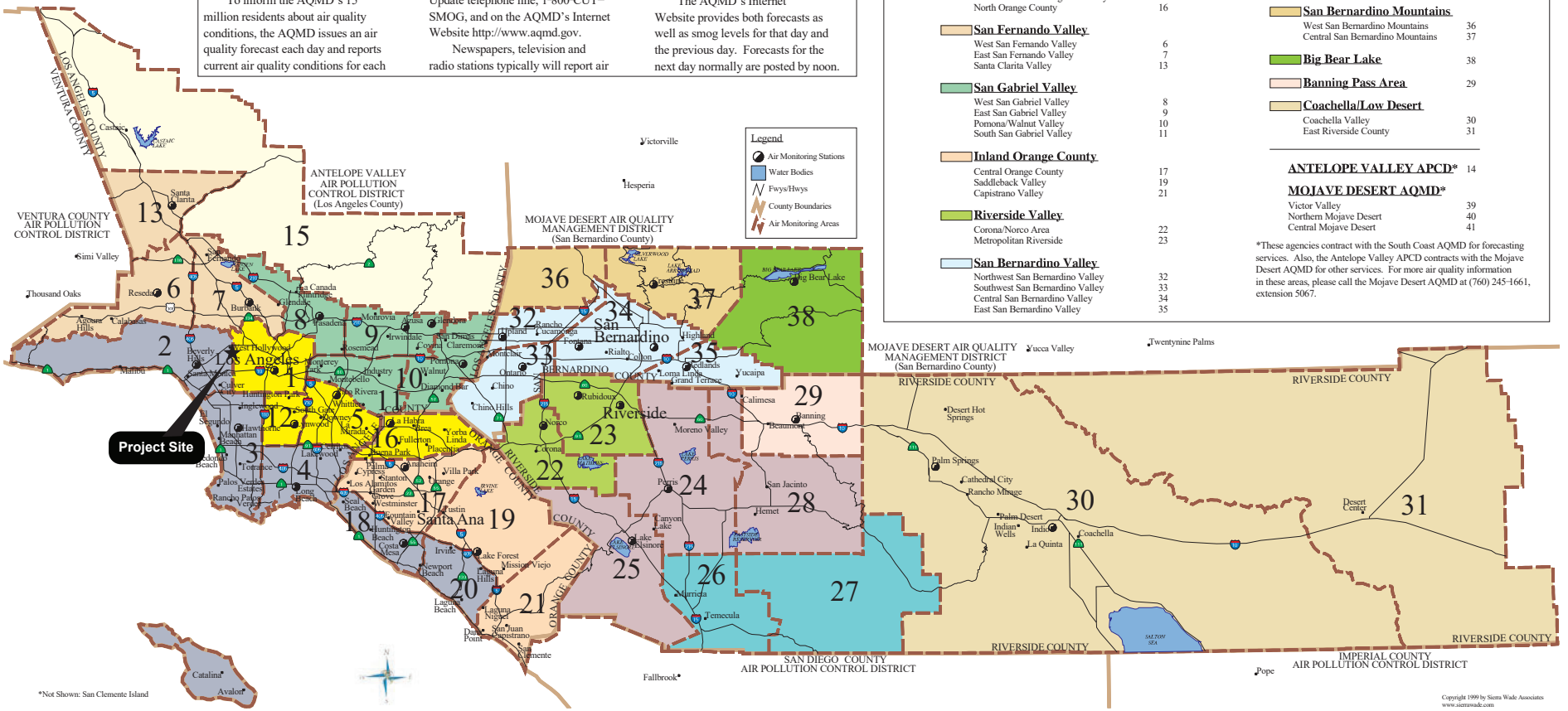

Figure IV.A-3
SCAQMD SRAs

Source: Sierra Wade Associates, 1999.

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

Pollutant	Year		
	2018	2019	2020
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.10	0.09	0.19
Days exceeding CAAQS (0.09 ppm)	2	0	14
Maximum 8-hour Concentration (ppm)	0.07	0.08	0.12
Days exceeding NAAQS (0.070 ppm)	4	2	22
Days exceeding CAAQS (0.07 ppm)	4	2	22
Respirable Particulate Matter (PM_{10})			
Maximum 24-hour Concentration (µg/m^3)	81	62	77
Days exceeding NAAQS (150 µg/m^3)	0	0	0
Days exceeding CAAQS (50 µg/m^3)	31	3	24
Annual Arithmetic Mean (AAM) (µg/m^3)	34	26	23
Does measured AAM exceed CAAQS (20 µg/m^3)?	**Yes**	**Yes**	**Yes**
Fine Particulate Matter ($PM_{2.5}$)			
Maximum 24-hour Concentration (µg/m^3)	44	44	47
Days exceeding NAAQS (35 µg/m^3)	3	1	2
Annual Arithmetic Mean (AAM) (µg/m^3)	13	11	12
Does measured AAM exceed NAAQS (12 µg/m^3)?	**Yes**	No	**Yes**
Does measured AAM exceed CAAQS (12 µg/m^3)?	**Yes**	No	**Yes**
Carbon Monoxide (CO)			
Maximum 1-hour Concentration (ppm)	2	2	2
Days exceeding NAAQS (35 ppm)	0	0	0
Days exceeding CAAQS (20 ppm)	0	0	0
Maximum 8-hour Concentration (ppm)	2	2	2
Days exceeding NAAQS and CAAQS (9 ppm)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.07	0.07	0.06
Days exceeding NAAQS (0.10 ppm)	0	0	0
Days exceeding CAAQS (0.18 ppm)	0	0	0
Annual Arithmetic Mean (AAM) (ppm)	0.02	0.02	0.02
Does measured AAM exceed NAAQS (0.0534 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
Sulfur Dioxide (SO_2)			
Maximum 1-hour Concentration (ppm)	0.02	0.01	0.004
Days exceeding NAAQS (0.075 ppm)	0	0	0
Days exceeding CAAQS (0.25 ppm)	0	0	0
Maximum 24-hour concentration (ppm)	N/A	N/A	N/A
Days exceeding CAAQS (0.04 ppm)	0	0	0
Days exceeding NAAQS (0.14 ppm)	0	0	0
Annual Arithmetic Mean (AAM) (ppm)	N/A	N/A	N/A
Does measured AAM exceed NAAQS (0.03 ppm)?	N/A	No	No

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

Pollutant	Year		
	2018	2019	2020
Lead[a]			
Maximum 30-day Average Concentration (µg/m^3)	0.01	0.012	0.013
Does measured concentration exceed CAAQS (1.5 µg/m^3)	No	No	No
Maximum Rolling 3-Month Average Concentration (µg/m^3)	0.01	0.01	0.01
Does measured concentration exceed NAAQS (1.5 µg/m^3)	No	No	No
Sulfate			
Maximum 24-hour Concentration (µg/m^3)	5	5.1	3.3
Does measured concentration exceed CAAQS (25 µg/m^3)	No	No	No

µg/m^3 = micrograms per cubic meter

AAM = annual arithmetic mean

CAAQS = California Ambient Air Quality Standards

NAAQS = National Ambient Air Quality Standards

ppm = parts per million by volume

N/A = Not available at this monitoring station.

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

Source: South Coast Air Quality Management District Ambient Monitoring Data (2018–2020), www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed December 16, 2021.

Based on this screening analysis, no major sources of TACs were found within the Project vicinity.

(c) Surrounding Uses

As shown in Figure IV.A-4 on page IV.A-30, the Project Site is located in an urbanized area. The Project vicinity is characterized by a variety of uses, including commercial uses, residential uses, a religious temple, several small hotels, Fairfax High School, Ohel Chana High School, Morasha Hebrew Academy, and personal fitness facilities to the north; a café, grocery store, U.S. Post Office, Pan Pacific Park, an outdoor amphitheater, Holocaust Museum LA, commercial uses, and residential uses to the east; The Grove, The Original Farmers Market, the Gilmore Adobe, the Farmers Market Storage Facility, surface parking, Hancock Park Elementary School, and residential uses to the south; and commercial and residential uses interspersed with small surface parking lots to the west of the Project Site. In particular, Hancock Park Elementary School is located approximately 1,500 feet south of the Project Site; Fairfax High School is located

Figure IV.A-4
Air Quality Sensitive Receptors Locations

Source: ArcGIS, 2022; Eyestone Environmental, 2022.

approximately 1,600 feet north of the Project Site; and Ohel Chana High School and Morasha Hebrew Academy are located approximately 150 feet and 800 feet to the northeast, respectively. Pan Pacific Park, which includes a variety of active and passive recreational uses, is located approximately 100 feet east of the Project Site.

(d) Sensitive Uses

Some population groups, including children, the elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to air pollution than others. SCAQMD's Localized Significance Threshold Methodology for CEQA Evaluations provides mass rate look-up tables with Localized Significance Thresholds (LSTs) based on the distance between receptors and project site boundaries.[39] The shortest receptor distance provided in the SCAQMD look-up tables is 25 meters (82 feet). The SCAQMD recommends that projects with boundaries closer than 25 meters to the nearest receptor use the LSTs for receptors located at 25 meters. As shown in Figure IV.A-4 on page IV.A-30, the closest sensitive receptor land uses to the Project Site are the residential uses located east of and directly adjacent to the Project Site. While there are other sensitive receptors in the Project vicinity, they are located farther than 25 meters from the Project Site. In accordance with SCAQMD recommendations, the LST receptor distance was assumed to be 25 meters. All other existing air quality-sensitive uses are located at greater distances from the Project Site and would experience lower air quality impacts from potential sources of emissions at the Project Site due to atmospheric dispersion effects.

(e) Existing Project Site Emissions

The approximately 25-acre Project Site is currently developed with 743,680 square feet of studio-related uses, including 95,540 square feet of sound stage uses; 325,450 square feet of production support uses, such as storage and mills; 163,090 square feet of production office space; and 159,600 square feet of general office space. The existing development is comprised of four main buildings. The Project Site also contains approximately 30 ancillary buildings and structures, including storage buildings, modular/portable bungalows and trailers, shelters and pads for utilities and transmission equipment, carports with solar panels, guard houses, and a helipad. In addition, 1,510 surface parking spaces are located on the Project Site, which are provided primarily in surface parking areas along the Project Site perimeter.

Mobile source emissions are generated by motor vehicle trips to and from the Project Site. Area source emissions are generated by the use of maintenance equipment,

[39] Refer to www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds for more information.

landscape equipment, and products that contain solvents. Energy source emissions are typically associated with building natural gas usage. Table IV.A-3 below presents an estimate of the existing regional operational emissions generated within the Project Site.

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

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	17	<1	<1	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	11	14	111	<1	22	6
Emergency Generators	<1	8	4	<1	<1	<1
Paint Spray Booths	9	0	0	0	1	<1
Total Existing Emissions[a]	**38**	**24**	**116**	**2**	**23**	**8**

Numbers may not add up exactly due to rounding.

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

Source: Eyestone Environmental, 2022.

3. Project Impacts

a. Thresholds of Significance

(1) CEQA Guidelines Appendix G

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

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

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

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

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

For this analysis, the Appendix G Thresholds listed above are relied upon. The City's 2006 L.A. CEQA Thresholds Guide includes factors to assist in answering the Appendix G Threshold questions.

(2) 2006 L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide identifies the following factors that may be relevant to the air quality impacts analysis:

(a) Construction

(i) Combustion Emissions from Construction Equipment

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

(ii) Fugitive Dust—Grading, Excavation and Hauling

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

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

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

(iv) Other Mobile Source Emissions

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

(b) Operation

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

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

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

(c) Toxic Air Contaminants

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

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

The degree to which project design will reduce the risk of exposure.

(3) SCAQMD's CEQA Air Quality Handbook

To assist in answering the Appendix G threshold questions and factors identified in the City's 2006 L.A. CEQA Thresholds Guide, the City utilizes the thresholds of significance in SCAQMD's CEQA Air Quality Handbook, Chapter 6, as identified below, to assess the

significance of a project's estimated air quality impacts. Specifically, Table IV.A-4 on page IV.A-36 shows SCAQMD's currently recommended significance thresholds, which provide numerical thresholds for evaluating the significance of a project's estimated air quality emissions.

(a) Construction

Based on the criteria set forth in SCAQMD's CEQA Air Quality Handbook, the Project would have a significant impact with regard to construction emissions if any of the following would occur:[40]

- Emissions from both direct and indirect sources would exceed any of the SCAQMD prescribed threshold levels identified in Table IV.A-4.
- Maximum on-site daily localized emissions exceed the LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m^3] over a 1-hour period or 9.0 ppm [10,350 µg/m^3] averaged over an 8-hour period) and NO_2 (0.18 ppm [338.4 µg/m^3] over a 1-hour period, 0.1 ppm [188 µg/m^3] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [56.4 µg/m^3] averaged over an annual period).
- Maximum on-site localized PM_{10} or $PM_{2.5}$ emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed the incremental 24-hour threshold of 10.4 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.

(b) Operation

Based on the criteria set forth in SCAQMD's CEQA Air Quality Handbook, the Project would have a significant impact with regard to operational emissions if any of the following would occur:[41]

- Emissions from both direct and indirect sources exceed any of the SCAQMD prescribed threshold levels identified in Table IV.A-4.
- Maximum on-site daily localized emissions exceed the LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO_2 (0.18 ppm over a

[40] SCAQMD, CEQA Air Quality Handbook, 1993.

[41] SCAQMD, CEQA Air Quality Handbook, 1993.

Table IV.A-4
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds[a]		
Pollutant	**Construction[b]**	**Operation[c]**
NO_X	100 lbs/day	55 lbs/day
VOC[d]	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead[e]	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in one million Cancer Burden > 0.5 excess cancer cases (in areas ≥ one in one million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants		
NO_2 1-hour average Annual Arithmetic Mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual Average	10.4 μg/m^3 (construction) & 2.5 μg/m^3 (operation) 1.0 μg/m^3	
$PM_{2.5}$ 24-hour average	10.4 μg/m^3 (construction) & 2.5 μg/m^3 (operation)	
SO_2 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal—99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 μg/m^3 (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day average Rolling 3-month average	1.5 μg/m^3 (state) 0.15 μg/m^3 (federal)	

lbs/day = pounds per day

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

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

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

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

thresholds.

[d] *Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.*

[e] *While the South Coast Air Quality Management District 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.*

Source: SCAQMD, 2019.

1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).[42]

- Maximum on-site localized operational PM_{10} and $PM_{2.5}$ emissions exceed the incremental 24-hour threshold of 2.5 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.[43]

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

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

(c) Toxic Air Contaminants

Based on the criteria set forth in the SCAQMD's CEQA Air Quality Handbook, the Project would have a significant TAC impact if:[44]

- The Project emits carcinogenic or TACs that exceed the maximum incremental cancer risk as provided in Table IV.A-4 on page IV.A-36.

In assessing impacts related to TACs in this section, the City uses Appendix G as the thresholds of significance. The criteria identified above from the L.A. CEQA Thresholds Guide are used where applicable and relevant to assist in analyzing the Appendix G

42 SCAQMD, LST Methodology, June 2003, revised July 2008.

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

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

thresholds. In addition, the following criteria set forth in SCAQMD's CEQA Air Quality Handbook serve as quantitative air quality standards to be used to evaluate a project's impacts under the Appendix G thresholds:

- The project results in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.[45]
- For projects with a maximum incremental cancer risk between one in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

(d) Consistency with Applicable Air Quality Plans

Section 15125 of the CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to evaluate the Project's consistency with the SCAQMD and SCAG regional plans and policies, including the AQMP:[46]

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

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

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

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

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

(e) Cumulative Impacts

Based on SCAQMD guidance, individual construction projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.[47] As discussed in SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution (August 2003):

> *As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*[48]

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

b. Methodology

SCAQMD published the CEQA Air Quality Handbook in November 1993 to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects proposed in the Air Basin. The CEQA Air Quality Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used in the preparation of this analysis. SCAQMD is

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

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

currently in the process of replacing the CEQA Air Quality Handbook with the Air Quality Analysis Guidance Handbook.[49]

Supplemental guidance/information to assist lead agencies is provided on the SCAQMD website and includes: (1) EMission FACtor model (EMFAC) on-road vehicle emission factors; (2) background CO concentrations; (3) localized significance thresholds; (4) mitigation measures and control efficiencies; (5) mobile source toxics analysis; (6) off-road mobile source emission factors; (7) $PM_{2.5}$ significance thresholds and calculation methodology; and (8) updated SCAQMD Air Quality Significance Thresholds. The SCAQMD also recommends using approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod). These recommendations were followed in the preparation of this analysis.[50]

SCAQMD has also adopted land use planning guidelines in the 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.[51] 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 of freeways and high-traffic roads and the same siting criteria for distribution centers and dry cleaning facilities). SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risks. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

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

(1) Construction Emissions Methodology

Construction of the Project has the potential to generate temporary pollutant emissions through the use of heavy-duty construction equipment, such as excavators and cranes, and through vehicle trips generated from workers and haul and delivery trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from

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49 SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed December 16, 2021.

50 SCAQMD, Air Quality Analysis Handbook, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed December 16, 2021.

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

demolition and various soil-handling activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

(a) Regional Emissions

The Project's "regional" emissions refer to emissions that will be evaluated based on the regional significance thresholds established by SCAQMD, as discussed above. Daily regional emissions during construction are estimated by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying mobile source and fugitive dust emissions factors. The emissions are estimated using CalEEMod (Version 2020.4.0) software, an emissions inventory software program recommended by SCAQMD. The CalEEMod model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with SCAQMD, received input from other California air districts, and is currently used by numerous lead agencies in the State and in the Los Angeles area, including the City, for quantifying the emissions associated with development projects undergoing environmental review.

CalEEMod is based on outputs from the Off-Road Emissions Inventory Program model (OFFROAD) and EMFAC, which are emissions estimation models developed by CARB and are used to calculate emissions from construction activities, including off- and on-road vehicles, respectively.[52,53] CalEEMod also relies upon known emissions data associated with certain activities or equipment (often referred to as "default" data, values or factors) that can be used if site-specific information is not available. CalEEMod contains default values to use in each specific local air district region. Default values within CalEEMod were obtained from a survey of construction sites conducted by SCAQMD. The construction survey data were used to determine appropriate construction equipment based on lot size and project type.[54] Appropriate statewide default values can be used if regional default values are not defined.

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[52] CARB, MSEI, Documentation, Off-Road, Diesel Equipment, ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road, accessed December 16, 2021.

[53] CARB, EMFAC 2014, www.arb.ca.gov/msei/categories.htm#onroad_motor_vehicles, accessed December 16, 2021.

[54] CAPCOA, California Emissions Estimator Model, Appendix E1: Construction Survey and SCAQMD, October 2017.

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

(b) Localized Emissions

The localized effects from the on-site portion of daily construction emissions were determined at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling, where appropriate, to assess whether the Project's local emissions would exceed the SCAQMD's significance thresholds, as described above.[55] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, and $PM_{2.5}$.[56] SCAQMD does not provide an LST for SO_2, Pb, and H_2S since land use development projects typically result in negligible construction and long-term operation emissions of these pollutants, as on-site activities during construction and operation do not include activities that emit high levels of these pollutants. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and the distance to the nearest sensitive receptor. These ambient air quality standards were established at levels that provide public health protection and allow an adequate margin of safety, including protecting the health of sensitive populations, such as asthmatics, children, and the elderly. SCAQMD developed mass rate look-up tables for each source receptor area and to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas

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

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

that are less than or equal to five acres. For projects that exceed five acres, such as the Project, the 5-acre LST look-up values can be used as a screening tool to determine which pollutants require detailed analysis.[57] This approach is conservative as it assumes that all on-site emissions would occur within a 5-acre area and, therefore, over-predicts potential localized impacts (i.e., more pollutant emissions occurring within a smaller area and within closer proximity to potential sensitive receptors). As an example, if a project site is 10 acres (40,470 square meters) with an emission rate of 100 pounds per day from on-site activities, then the pollutant emissions would result in 0.0025 pounds per square meter per day. If the same amount of pollutant emissions occurred over a 5-acre site, then the emission rate would be 0.005 pounds per square meter per day or double the emission rate per square meter. The AERMOD dispersion model is a Gaussian model, so a receptor's pollutant concentration from area and volume sources is proportional to the distance to the receptor and the pollutant emission rate. A higher emission rate would result in a higher pollutant concentration at a receptor given the same distance. As shown in SCAQMD's LST look-up tables, an increase in the site acreage from one, two, to five acres allows for more pollutant emissions without exceeding the significance thresholds.

If a project exceeds the LST look-up values, then SCAQMD recommends that project-specific air quality modeling be performed.

(2) Operation Emissions Methodology

(a) Regional Emissions

The analysis of the Project's impact on regional air quality during long-term Project operations (i.e., after construction is complete) considers four types of sources: (1) area, (2) energy, (3) mobile, and (4) stationary. Area source emissions are generated by, among other things, landscape equipment, fireplaces, and the use of consumer products. Energy source emissions are generated as a result of activities in buildings for which natural gas is used (e.g., natural gas for heat or cooking). Mobile source emissions are generated by the increase in motor vehicle trips to and from the Project Site associated with operation of the Project. Stationary source emissions are generated from proposed emergency generators during routine maintenance/testing.

Criteria pollutants are also emitted during the generation of electricity at fossil fuel power plants. When electricity is used in buildings, the electricity generation typically takes place at off-site power plants, the majority of which burn fossil fuels. Because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant

[57] Telephone communication with Ian MacMillan, SCAQMD CEQA Program Supervisor, November 10, 2011.

emissions are generally associated with the power plants themselves and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered to be the maximum feasible level of mitigation for stack emissions. CalEEMod, therefore, does not calculate criteria pollutant emissions from regional power plants associated with building electricity use.

Similar to construction, SCAQMD's CalEEMod model was used to estimate Project emissions during operation. Mobile source emissions were calculated within CalEEMod. However, CalEEMod default VMT was bypassed to account for the Project-related VMT provided using the Los Angeles Department of Transportation (LADOT) VMT Calculator. The VMT Calculator was developed by the City and LADOT to comply with SB 743, which requires lead agencies to adopt VMT criteria to determine transportation-related impacts.

Previously, trip generation for land uses was calculated based on survey data collected by the Institute of Transportation Engineers (ITE). However, these ITE trip generation rates were based on data collected at suburban, single-use, free-standing sites, which may not be representative of urban mixed-use environments. Beginning in 2019, the USEPA sponsored a study to collect travel survey data from mixed-use developments in order provide a more representative trip generation rate for multi-use sites. Results of the USEPA survey indicate that trip generation and VMT are affected by factors, such as resident and job density, availability of transit, and accessibility of biking and walking paths. Based on these factors, the USEPA developed equations known as the EPA Mixed-Use Development (MXD) model to calculate trip reductions for multi-use developments.[58] The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for the Project's features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites.

By default, CalEEMod calculates Project VMT based on the number of trips generated by the Project, multiplied by the default trip lengths for Los Angeles County. However, for consistency, the Project's trips and VMT calculated by the LADOT VMT Calculator were input directly into CalEEMod. CalEEMod then converts EMFAC2017 emission rates into CalEEMod vehicle emission factors.[59] The LADOT VMT Calculator estimates the reduction in trips and VMT by calculating the internal capture of trips within mixed-use developments, as well as walking and transit use for trips starting or ending in mixed-use developments.

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58 Environmental Protection Agency, Mixed-Use Trip Generation Model. www.epa.gov/smartgrowth/mixed-use-trip-generation-model, accessed on March 23, 2022.

59 CAPCOA, California Emissions Estimator Model, Appendix A: Calculation Details for CalEEMod, November 2017.

Area source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. Natural gas usage factors in CalEEMod are based on the California Energy Commission California Commercial End Use Survey data set, which provides energy demand by building type and climate zone. Emissions associated with the use of emergency generators are calculated using CalEEMod, in which emission factors are based on Table 3.4-1 (Gaseous Emission Factors for Large Stationary Diesel Engines) from USEPA's AP-42: Compilation of Air Pollutant Emission Factors. The emissions are based on the horsepower rating of the diesel generator and the number of hours operated per year for testing purposes.

To determine if a significant air quality impact would occur, the net increase in regional operational emissions generated by the Project was compared against SCAQMD's significance thresholds.[60] To be conservative, this analysis evaluates the Project's air quality impacts during operations based on reasonably expected maximum operational emissions even though such emissions would not occur throughout the entire operational phase. Refer to Appendix B of this Draft EIR for additional information regarding methodology.

(b) Localized Emissions

(i) On-Site Emissions

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

(ii) Off-Site Emissions

Potential localized CO concentrations from induced traffic at nearby intersections are addressed consistent with the methodologies and assumptions used in the consistency analysis provided in the 2003 AQMP.[61]

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

[61] The latest CO hotspots modeling and attainment demonstration was performed as part of the 2003 AQMP. Results of the attainment demonstration were eventually incorporated into the redesignation request and approved by the USEPA.

CO exceedances are caused by vehicular emissions, primarily when idling at intersections.[62,63,64] Accordingly, vehicle emissions standards have become increasingly more stringent. Before the first vehicle emission regulations, cars in the 1950s were typically emitting about 87 grams of CO per mile.[65] Currently, the CO standard in California is a maximum of 3.4 grams/mile for passenger cars (with provisions for certain cars to emit even less).[66] With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Air Basin have steadily declined.

The analysis prepared for CO attainment in the Air Basin by SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[67] As discussed in the 1992 CO Plan, peak CO concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for the four worst-case scenario intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The peak modeled CO concentrations due to vehicle emissions occurred at the intersection of Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than

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

63 SCAQMD, CEQA Air Quality Handbook, Section 4.5, 1993.

64 SCAQMD, Air Quality Management Plan, 2003.

65 USEPA, Timeline of Major Accomplishments in Transportation, Air Pollution, and Climate Change, www.epa.gov/air-pollution-transportation/timeline-major-accomplishments-transportation-air-pollution-and-climate, accessed December 16, 2021.

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

67 SCAQMD, Federal Attainment Plan for Carbon Monoxide, 1992.

400,000 vehicles per day.[68] The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. Metro evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard and Veteran Avenue intersection and found it to be LOS E at peak morning traffic and LOS F at peak afternoon traffic.[69,70] As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot. If a project would potentially result in a CO hotspot based on the initial screening, detailed modeling may be performed using California LINE Source Dispersion Model (CALINE4) Version 4, which is a model used to assess air quality impacts near transportation facilities (i.e., roadways, intersections, street canyons, and parking facilities).

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

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with SCAQMD guidance and CARB's Air Quality and Land Use Handbook: A Community Health Perspective. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources and evaluating the potential for such sources to cause significant TAC impacts. If the qualitative evaluation determines the potential for significant impacts from a new TAC source, or modification of an existing TAC emissions source, a more detailed dispersion analysis is conducted to evaluate estimated Project TAC emissions against the applicable SCAQMD significance thresholds based on downwind sensitive receptor locations.

c. Project Design Features

The Project will include the following Project design feature related to air quality:

Project Design Feature AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar powered generators, rather than temporary diesel or gasoline generators, will be used during construction.

In addition, the Project will incorporate Project design features to promote environmental sustainability as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. While these features are designed primarily to reduce GHG emissions, they

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

69 Metro measured traffic volumes and calculated the LOS for the intersection of Wilshire Boulevard/ Sepulveda Avenue, which is a block west along Wilshire Boulevard, east of the San Diego Freeway (I-405).

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

would also serve to reduce emissions of the criteria air pollutants discussed herein. Specifically, Project Design Feature GHG-PDF-1 requires the design of new buildings to incorporate sustainability features identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program to be capable of meeting the standards of LEED Gold under LEED v4 or equivalent green building standards. Such features may include the use of light-emitting diode (LED) fixtures and other efficient lighting technology; energy saving lighting control systems, such as light- and motion-detection controls; and energy efficient heating, ventilation, and air conditioning (HVAC) equipment. Project Design Feature GHG-PDF-2 would require photovoltaic panels on the Project Site capable of providing a minimum of 2,000,000 kilowatt hours (kWh) of electricity annually. The Project would comply with the City's electric vehicle (EV) charging requirements, which specify that 10 percent of new parking spaces must include EV charging equipment, and a total of 30 percent of all new parking spaces must be required to be EV "ready" in order to support future EV charging equipment.[71] The Project would also include water conservation features as set forth in Project Design Feature WAT-PDF-1 in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. In addition, as set forth in Project Design Feature TR-PDF-2 in Section IV.K, Transportation, of this Draft EIR, a Transportation Demand Management (TDM) Program will be developed and include strategies to promote non-automobile travel and reduce single-occupant vehicle trips. Several of these sustainability measures are accounted for in this air quality analysis, where appropriate and quantifiable.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) SCAQMD CEQA Air Quality Handbook Policy Analysis

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

- Criterion 1: Would the project result in any of the following:

[71] City of Los Angeles Ordinance No. 186,485, December 11, 2019.

- An increase in the frequency or severity of existing air quality violations;
- Cause or contribute to new air quality violations; or
- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?

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

(i) Criterion 1

The Project represents an infill development located in close proximity to existing and proposed transit lines and would utilize existing infrastructure to service the proposed uses. As such, the Project would advance regional goals to reduce VMT through infill development near transit that will reduce air emissions compared to the average regional project. The Project Applicant is pursuing LEED Gold or equivalent, and, consistent with Project Design Feature GHG-PDF-2, the Project would provide photovoltaic panels on the Project Site capable of generating a minimum of 2,000,000 kWh. The Project also involves the re-use of certain existing buildings and facilities. Both in compliance with and, in some cases, in exceedance of CALGreen and LAMC requirements, a number of specific sustainable design components would be incorporated into the Project, including, but not limited to, Energy Star appliances, solar panels, green walls in some outdoor areas, vegetated roofs or cool roof systems to help reduce energy use, short- and long-term bicycle parking, EV charging infrastructure, a TDM Program, a proposed Mobility Hub, and use of daylighting where feasible. Such measures would address energy conservation and serve to reduce air emissions.

With respect to the first criterion, as discussed below, localized concentrations of NO_2 (as NO_X), CO, PM_{10}, and $PM_{2.5}$ have been analyzed for the Project. Due to California Low Sulfur Diesel Fuel requirements, the calculations shown below demonstrate that SO_2 emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or affect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O_3 formation, however, it is classified as a precursor pollutant, and a regional emissions threshold has been established.

The Project's maximum potential NO_X, CO, PM_{10}, and $PM_{2.5}$ daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table IV.A-9 on page IV.A-69 further below, the Project's maximum construction emissions would not exceed the SCAQMD-recommended localized screening thresholds for NO_2 (as NO_X) and CO but would exceed the SCAQMD-recommended localized screening thresholds for PM_{10} and $PM_{2.5}$. As shown in Table IV.A-11 on page IV.A-74 further below, PM_{10} and $PM_{2.5}$ emissions would be reduced below the SCAQMD-recommended LSTs with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4.

Because the Project would not introduce any substantial stationary sources of emissions, CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.[72] As discussed below, no intersections would require a CO hotspot analysis, and impacts would be less than significant.

An analysis of potential localized operational impacts from on-site activities was also conducted. As shown in Table IV.A-10 on page IV.A-70 further below, localized NO_2 (as NO_X), CO, PM_{10}, and $PM_{2.5}$ operational emissions would not exceed the LSTs, and impacts would be less than significant.

Therefore, the Project would not increase the frequency or severity of an existing air quality violation, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

(ii) Criterion 2

With respect to the second criterion for determining consistency with the 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 three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

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

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

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City's General Plan and SCAG's 2016–2040 RTP/SCS. As noted above, the 2020–2045 RTP/SCS is now available. However, because the 2016 AQMP is based on the previous RTP/SCS, a comparison with employment growth projections from the 2016–2040 RTP/SCS is provided below. The population, housing, and employment forecasts adopted by SCAG's Regional Council are based on the local plans and policies applicable to specific areas in the region; these are used by SCAG in all phases of implementation and review.

The proposed Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon buildout. The Project is estimated to generate a total of 7,832 employees at buildout, for a net increase of 5,702 employees over existing conditions. Compared against employment data from the 2016–2040 RTP/SCS, an estimated 4,561,000 employees are projected within the City of Los Angeles in 2021 and 4,736,000 in 2026 (the Project's earliest buildout year), with 175,000 new employees projected in the City between 2021 and 2026. The Project's net increase in employment would represent approximately 0.12 percent of the total number of employees in the City in 2026 and approximately 3.3 percent of the growth between 2021 and 2026.[73] **Because 2016–2040 RTP/SCS projections form the basis of the 2016 AQMP, the Project would be consistent with the projections in the AQMP.**

- Does the project implement feasible air quality mitigation measures?

The Project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) required by SCAQMD, as summarized above. The Project also would incorporate Project Design Feature AIR-PDF-1, detailed above, as well as those discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, to support and promote environmental sustainability. While these latter features are designed primarily to reduce GHG emissions, they would also reduce emissions of the criteria air pollutants discussed

[73] Compared against employment data from the 2020–2045 RTP/SCS, an estimated 1,947,472 employees are projected within the City of Los Angeles in 2026, the Project's earliest buildout year, with 49,586 new employees projected in the City between 2021 and 2026. The Project's net increase in employment would represent approximately 0.29 percent of the total number of employees in the City in 2026 and approximately 11.50 percent of the growth between 2021 and 2026.

herein. Furthermore, implementation of Mitigation Measure AIR-MM-1 (which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards) and Mitigation Measure AIR-MM-2 (which requires the use of 2010 model year or newer engines that meet CARB's 2010 engine emission standards for haul trucks associated with demolition and grading/excavation activities and concrete delivery trucks during concrete mat foundation pours), set forth below, would reduce localized air quality impacts to less than significant levels. **As such, the Project would be consistent with this AQMP consistency criterion.**

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

As an infill development, the Project would advance the goals of the AQMP and RTP/SCS to reduce VMT and related vehicle emissions. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. SCAQMD combines its portion of the Plan with those prepared by SCAG. The RTP/SCS and TCMs, included as Appendix IV-C to the 2016 AQMP/SIP for the Basin, are based on SCAG's 2016–2040 RTP/SCS.

With regard to land use developments such as the Project, the AQMP's 2016–2040 RTP/SCS land use control measures (i.e., goals and policies) focus on the reduction of vehicle trips and VMT. A number of bus lines provide transit service throughout the Project area, with bus stops located adjacent to the Project Site on both Beverly Boulevard and Fairfax Avenue, as well as within a 0.25-mile radius. These bus lines include Los Angeles County Metropolitan Transportation Authority (Metro) Bus Lines 14, 16, 17, 217, 218, 316, and 780; and Los Angeles Department of Transportation (LADOT) DASH Line FX. In addition, Metro transit facilities planned in the area include the Metro D (Purple) Line extension. The first section of the Metro D (Purple) Line extension, which includes a new Wilshire/Fairfax Station, is currently under construction and scheduled to open in 2024. The new Wilshire/Fairfax Station will be located approximately 0.8 mile south of the Project Site, with a station portal on the southeast corner of Wilshire Boulevard and Orange Grove Avenue. The Project would provide multi-modal transportation solutions, including a Mobility Hub on-site, to connect with surrounding public transit lines, encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit.

The increase in transit accessibility would further reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation. The Project would also provide pedestrian access that minimizes barriers and links the Project Site with external streets to encourage people to walk instead of drive. By designing the Project to incorporate the land use strategies identified in the 2016–2040 RTP/SCS, the Project

would reduce the length and number of automobile trips, thereby reducing vehicle emissions. The Project trip generation estimates identified in the Transportation Assessment for the Project approved by LADOT account for these Project features by taking credit for transit use by future visitors and employees.[74] The Project's incorporation of VMT reduction features (i.e., the TDM Program described in Project Design Feature TR-PDF-2) would result in an approximately 37-percent reduction in overall VMT. This reduction in VMT would support the goals of the 2016–2040 RTP/SCS, which provides an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and a 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040.[75] **Accordingly, the Project would support the applicable AQMP and RTP/SCS objectives of reducing VMT and the related vehicular air emissions.**

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. The Project is an infill development and several nearby bus lines provide transit service throughout the Project area. The Project would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. **As discussed above, the Project would be consistent with the goals and policies of the AQMP and, therefore, would not conflict with or obstruct implementation of SCAQMD's AQMP.**

(b) City of Los Angeles Policies

To achieve the goals of the General Plan Air Quality Element, performance-based standards have been adopted to provide flexibility in implementation of its policies and objectives. The Project would advance regional and City goals to reduce VMT and related vehicle emissions, which would also decrease emissions from mobile sources. In addition, the Project includes bicycle parking spaces for the proposed uses as required by the LAMC and is well served by transit, including local and regional bus and rail lines. Furthermore, the Project would comply with the City's EV charging requirements, which specify that 10 percent of new parking spaces must include EV charging stations. Additionally, 30 percent of all new parking spaces must be capable of supporting future EV charging equipment (inclusive of the aforementioned 10 percent with EV chargers). 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 Project is consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options. The Project

[74] Gibson Transportation Consulting, Inc., Transportation Assessment for the Television City 2050 Specific Plan Project, October 2021.

[75] The 2020–2045 RTP/SCS reflects CARB's updated SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035.

also includes primary entrances for pedestrians and bicyclists that would be safe and separated from vehicular traffic, easily accessible, and a short distance from transit stops. A more detailed analysis of the Project's consistency with the applicable goals, objectives, and policies from the City's General Plan is presented in Table IV.A-5 on page IV.A-55. **As discussed therein, the Project would be consistent with the applicable goals, objectives, and policies of the Air Quality Element and, therefore, would not conflict with the Air Quality Element.**

(c) Conclusion

In summary, the analysis of Threshold (a) is based on the Project's consistency with the AQMP and other City plans and policies. The determination of AQMP consistency is primarily concerned with the long-term effect of the Project on air quality in the Air Basin. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants with the implementation of mitigation measures during Project construction. As the Project would not exceed any of the state or federal standards, the Project would not delay the timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project is consistent with the growth projections that form the basis of the 2016 AQMP, the Project would be consistent with the emissions forecasts in the AQMP. Furthermore, since the Project would implement feasible air quality mitigation measures (i.e., Mitigation Measures AIR-MM-1 through AIR-MM-4), which would reduce air quality impacts, the Project would meet this AQMP consistency criterion. Additionally, as the Project would support the City of Los Angeles and SCAQMD's objectives to reduce VMT and related vehicular emissions, the Project would be consistent with AQMP control measures. **Thus, the Project would not conflict with or obstruct implementation of the AQMP or applicable City of Los Angeles policies pertaining to air quality. However, based on the need for mitigation to reduce certain air emissions (discussed further below), impacts related to Threshold (a) would be significant prior to implementation of mitigation measures.**

(2) Mitigation Measures

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

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

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

Recommendation	Analysis of Project Consistency
Air Quality Element	
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	**No Conflict.** As an infill project in close proximity to transit, the Project would reduce VMT through its on-site Mobility Hub and TDM Program. This access to various modes of transportation would reduce reliance on automobiles, thereby minimizing associated air emissions. As discussed in more detail in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would be consistent with the City of Los Angeles Green Building Code and the State Green Building Standards Code (CALGreen Code) and would incorporate Project design features to promote environmental sustainability and energy efficiency, including meeting the standards of LEED Gold or equivalent green building standards. The Project would, thus, reduce air emissions and increase traffic mobility while also sustaining economic growth.
Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.	**No Conflict.** The Project's location, land use characteristics, and Project design features would reduce emissions associated with energy and transportation. As discussed under Threshold (a), the Project would be consistent with the relevant SCAG growth projections in the SCAG 2016–2040 RTP/SCS which are used in preparing the 2016 AQMP. Furthermore, the Project would be consistent with the relevant SCAG growth projections in the SCAG 2020–2045 RTP/SCS. The Project includes bicycle parking spaces for the proposed uses as required by the LAMC and is well served by transit, including local and regional bus and rail lines. The Project would also provide multi-modal transportation solutions, including a Mobility Hub, to connect with surrounding public transit lines, encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit. The Project would, thus, reduce air emissions and increase traffic mobility while also sustaining economic growth.
Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	**No Conflict.** The Project would comply with SCAQMD Rule 403, which requires dust control measures during construction activities. The Project would require the construction contractor(s) to comply with the applicable provisions of CARB's In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of diesel particulate matter filters and the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. In addition, the Project would not include large areas of unpaved surfaces and would replace existing surface parking lots with structured parking. Parking areas would be maintained in a clean and well-kept manner. The

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

Recommendation	Analysis of Project Consistency
	Project would, thus, reduce air emissions emanating from unpaved areas, parking lots, and construction sites.
Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips. **Objective 2.1:** It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	**No Conflict.** The Project's urban infill location, synergistic land use characteristics, and Project design features would reduce both work and non-work trips and VMT, thereby reducing air emissions. More specifically, the Project Site is located in proximity to a regional job center, commercial uses, and residential developments, thereby reducing the distances traveled by future employees and visitors. The Project would implement a TDM Program to promote and provide employees and visitors with opportunities to utilize alternative transportation modes and reduce the number of single-occupant vehicle trips to the Project Site. The Project would include a Mobility Hub to provide multi-modal mobility options that would provide better connection to existing and future transit options, encourage alternative means of transportation and improve pedestrian and bicycle access. In addition, short-term and long-term bicycle parking would be provided as required by LAMC. The Project would implement a TDM Program to reduce vehicle trips to/from the Project Site. The TDM Program would include an educational program/on-site coordinator, bicycle and pedestrian amenities, shuttle service to the future Metro D (Purple) Line Wilshire/Fairfax station, a ride-share matching and carpool/vanpool program, first-mile/last-mile options, a Guaranteed Ride Home Program and incentives for alternative travel modes. The on-site coordinator would reach out to employees directly to promote the benefits of the TDM Program and would provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, rideshare/carpool/vanpool programs, and parking incentives. The Project Site is also served by several public transportation stops within a half-mile. By focusing growth in a high-density, jobs-rich area in close proximity to transit, the Project's proximity to both job centers and housing, combined with the option to use alternative modes of transportation, would reduce reliance on single-occupant vehicles, as well as work trips as a step toward attaining trip reduction objectives necessary to achieve regional air quality goals, consistent with the goal and objective addressed herein.
Policy 2.1.1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles	**No Conflict**. The Project's urban infill location, synergistic land use characteristics, and Project design features would reduce work trips and VMT and, thus, reduce air emissions. As discussed above, the Project includes bicycle parking spaces for the proposed uses as

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

Recommendation	Analysis of Project Consistency
Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	required by the LAMC and is well served by transit, including local and regional bus and rail lines. The Project would also provide multi-modal transportation solutions, including a Mobility Hub, to connect with surrounding public transit lines, encourage alternative means of transportation, and focus growth in a high-density, jobs-rich area in close proximity to transit which would further encourage the use of alternative transportation. The Project's Mobility Hub would support first-mile/last-mile connections, encourage employee and visitor use of public transit, carpooling, vanpooling, and biking/scootering to work, and support TDM strategies to further reduce the number of single-occupancy vehicle trips. The TDM Program would include an educational program/on-site coordinator, bicycle parking and amenities, pedestrian amenities, shuttle service to the planned Metro D (Purple) Line Wilshire/Fairfax station, a ride-share matching and carpool/vanpool program, first-mile/last-mile options, and a Guaranteed Ride Home Program. The on-site coordinator would reach out to employees directly to promote the benefits of the TDM Program and would provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, rideshare/carpool/vanpool programs, and parking incentives to reduce work trips and traffic congestion.
Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	**No Conflict.** As an infill project in close proximity to transit and housing, which addresses the relationship between land use, transportation, and air quality, the Project would reduce VMT with its Mobility Hub and TDM Program. The Project Site's location, which is near major employment areas and residential uses, would facilitate a reduction of vehicle trips and associated VMT. The Project is also consistent with the 2016 AQMP and both the 2016–2040 and 2020–2045 RTP/SCS.
Objective 4.1: It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.	**No Conflict.** Although applicable on a Citywide basis, the Project analysis of potential air quality impacts relies upon the numeric indicators established by SCAQMD, which aims to attain the ambient air quality standards. Localized air quality impacts would be less than significant with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4 and would not cause or contribute to an exceedance of the ambient air quality standards. Although Project construction would result in a significant and unavoidable impact related to regional NO_X emissions, this impact would be temporary. Under the long-term buildout condition, as shown in Table IV.A-12 on page IV.A-76, concurrent construction and operational activities would result in a significant and

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

Recommendation	Analysis of Project Consistency
	unavoidable impact related to regional VOC and NO_X emissions; however, this impact would be temporary (NO_X impact would primarily occur during peak daily grading/export activities and VOC impact would primarily occur during peak daily painting activities). Accordingly, the City has considered the regional attainment of ambient air quality standards for the Project.
Policy 4.1.1: Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.	**No Conflict.** Although applicable on a Citywide basis, the Project would support this policy by coordinating with agencies, such as the City of Los Angeles Department of City Planning and the SCAQMD, throughout the environmental review process. As discussed above, the Project's location and land use and transportation characteristics would combine to reduce VMT and associated mobile air emissions.
Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and VMT associated with land use patterns.	**No Conflict.** Please refer to the discussion of Project consistency with Goal 2 and Objective 2.1.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**No Conflict.** The Project would provide new employment opportunities for the City's residents. As previously discussed, the Project Site is well served by transit, including local and regional bus and rail lines, and the Project would promote transit use and other alternative modes of transportation through its Mobility Hub and TDM Program. In addition, the Project would improve access to, within, and around the Project Site through first-mile/last-mile connections, pedestrian-friendly areas along all street frontages, and sidewalk improvements. As discussed further in Section IV.K, Transportation, of this Draft EIR, the Applicant would also contribute toward pedestrian facility improvements in the surrounding area as part of Vision Zero, including a pedestrian hybrid beacon at Stanley Avenue and Melrose Avenue. In addition, the Project is located adjacent to The Grove shopping center, The Original Farmers Market, and other establishments that can be easily accessed by new employees generated by the Project.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**No Conflict.** As discussed above, the Project would promote transit use through its Mobility Hub and TDM Program and would support alternative fuel vehicles through the provision of EV chargers and equipment. As discussed in Section IV.K, Transportation, of this Draft EIR, the Project would also improve the safety of pedestrians and bicyclists through sidewalk improvements, wider perimeter sidewalks and new driveways to reduce conflicts with vehicles, and pedestrian pathways on-site that connect to the existing sidewalk network. In addition, the Project would include short-term and long-term bicycle parking spaces for the

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

Recommendation	Analysis of Project Consistency
	proposed uses as required by the LAMC. The Project would, thus, be compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.
Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**No Conflict.** The environmental review conducted for the Project includes this analysis of air quality impacts; the decision-maker(s) for the requested discretionary actions will be responsible for ensuring that the environmental review is conducted in compliance with CEQA.
Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**No Conflict.** Please refer to the discussion of Project consistency with Goal 2 and Objective 2.1.
Source: Eyestone Environmental, 2022.	

(3) Level of Significance After Mitigation

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

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

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

(1) Impact Analysis

(a) Regional Emissions

(i) Construction

Project buildout may occur in one phase, with a total construction period of approximately 32 months. Construction could begin as soon as 2023 and end as soon as 2026. However, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043, as discussed further below. Nonetheless, this analysis assumes a 2026 buildout year to provide a conservative evaluation. It is estimated that earthwork activities during Project construction

would include up to approximately 772,000 cubic yards of cut, potentially 50,000 cubic yards of imported fill, and up to 772,000 cubic yards of export.[76] Hauling activities are anticipated to occur between the hours of 7:00 A.M. and 4:00 P.M. with approval from the Bureau of Engineering District Engineer as well as between 8:00 A.M. and 4:00 P.M. on Saturdays. Exported soil materials likely would be disposed of at United Rock Products Landfill in Irwindale via the Santa Monica Freeway (I-10) east to State Route 60 (SR-60) east to the San Gabriel River Freeway (I-605) north to Irwindale. Construction delivery/ haul trucks would travel on approved truck routes between the Project Site and the I-10 via the following optional routes:

Option 1: Empty trucks would travel westbound on I-10, exit at Washington Boulevard/Fairfax Avenue, turn right (north) on Fairfax Avenue and enter the Project Site from Fairfax Avenue (or continue north and make a right on Beverly Boulevard and then access the Project Site from Beverly Boulevard). Loaded trucks would exit the Project Site from Beverly Boulevard heading west and then turn left on Fairfax Avenue heading south, turn left on Washington Boulevard, and enter eastbound I-10.[77]

Option 2: Empty trucks would travel westbound on I-10, exit at La Brea Avenue, turn right (north) on La Brea Avenue, turn left (west) on San Vicente Boulevard, turn right (north) on Fairfax Avenue and enter the Project Site from Fairfax Avenue (or continue north and make a right turn on to Beverly Boulevard to access the Project Site from Beverly Boulevard). Loaded trucks would exit the Project Site from Beverly Boulevard heading west and then turn left on Fairfax Avenue heading south on Fairfax Avenue heading south, turn left on San Vicente Boulevard (east), turn right (south) on La Brea Avenue, and enter eastbound I-10.[78]

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[76] All earthwork volumes include estimates for both rough grading and overexcavation.

[77] Within this optional haul route, LADOT recommended that empty trucks travel westbound on I-10, exit at Washington Boulevard/Fairfax Avenue, turn right (north) on Fairfax Avenue, and turn right (east) to enter the Project Site from Fairfax Avenue (or continue north and make a right (east) on Beverly Boulevard and then access the Project Site from Beverly Boulevard at the Genesee Avenue signal). Loaded trucks would exit from Beverly Boulevard (at the Genesee Avenue signal) heading west and then turn left (south) on Fairfax Avenue, turn left (east) on Washington Boulevard, turn right to enter eastbound I-10,

[78] Within this optional haul route, LADOT recommended that empty trucks travel westbound on I-10, exit at La Brea Avenue, turn right (north) on La Brea Avenue, turn left (west) on San Vicente Boulevard, turn right (north) on Fairfax Avenue and enter the Project Site from Fairfax Avenue (or continue north and make a right turn on to Beverly Boulevard to access the Project Site from Beverly Boulevard at the Genesee Avenue signal). Loaded trucks would exit from Beverly Boulevard (at the Genesee Avenue signal) heading west and then turn left (south) on Fairfax Avenue, turn left (east) on San Vicente Boulevard, turn right (south) on La Brea Avenue, turn right to enter eastbound I-10, and continue on eastbound I-10.

Option 3: Empty trucks would travel westbound on I-10, exit at La Brea Avenue, turn right (heading north) on La Brea Avenue, turn left (heading west) on Beverly Boulevard and enter the site from Beverly Boulevard. Loaded trucks would exit the Project Site on Fairfax Avenue heading north, turn right on Beverly Boulevard (east) (or exit the Project Site via a right turn on Beverly Boulevard heading east), turn right (heading south) on La Brea Avenue, and enter eastbound I-10.[79]

Any hazardous soil materials would be exported to Buttonwillow Landfill in Kern County using the same local roadways, as follows: loaded trucks would travel Beverly Boulevard west to Fairfax Avenue south to Washington Boulevard east to I-10 west to I-405 north to I-5 north to Route 58 west to Lokern Road under Option 1; Beverly Boulevard west to Fairfax Avenue south to San Vicente Boulevard east to La Brea Avenue south to I-10 west to I-405 north to I-5 north to Route 58 west to Lokern Road under Option 2; or Fairfax Avenue north to Beverly Boulevard east to La Brea Avenue (or Beverly Boulevard east to La Brea Avenue) south to I-10 west to I-405 north to I-5 north to Route 58 west to Lokern Road under Option 3.

Based on SCAQMD factors, the construction equipment and truck fleet mix will emit less pollution in future years due to more stringent emissions control regulations. As construction air quality impacts are evaluated on a worst-case day, the shorter construction duration (2023–2026) would assume more intensive activities on a daily basis, as well as overlapping activities. Therefore, as a conservative assumption, it was assumed that construction would be completed by 2026. Furthermore, as discussed below, the Specific Plan would provide development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. The overall square footage of development and earthwork activities would remain the same under any potential buildout scenario. As such, the Project construction emissions provided below would be representative of any permitted development scenario.

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

[79] Within this optional haul route, LADOT recommended that empty trucks would travel westbound on I-10, exit at La Brea Avenue, turn right (north) on La Brea Avenue, turn left (west) on Beverly Boulevard, and enter the site from Beverly Boulevard at the Genesee Avenue signal. Loaded trucks would exit on Fairfax Avenue heading north, turn right (east) on Beverly Boulevard (or exit the Project Site via a right turn on Beverly Boulevard at the Genesee Avenue signal heading east), turn right (south) on La Brea Avenue, turn right to enter eastbound I-10, and continue on eastbound I-10.

During the finishing phase of the Project, paving and the application of architectural coatings (e.g., paints) could potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

The emissions levels in Table IV.A-6 on page IV.A-63 represent the highest daily emissions projected to occur during each year of construction and take into account overlapping construction phases. As presented in Table IV.A-6, construction-related daily maximum regional construction emissions would exceed SCAQMD daily significance thresholds for NO_X. The regional construction impact would primarily occur over a nine-month duration beginning in the fourth quarter of 2023 during concurrent demolition and grading/excavation operations. **Therefore, the regional construction emissions associated with the Project would result in a short-term significant impact related to NO_X.**

(ii) Operation

As discussed above, SCAQMD's CalEEMod was used to calculate regional area, energy, mobile source, and stationary emissions. The Project would incorporate Project design features to promote environmental sustainability, as discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. While these features are designed primarily to reduce GHG emissions, they would also serve to reduce emissions of the criteria air pollutants discussed herein. For purposes of the air quality analysis, the Project characteristics incorporated in this analysis include an increase in accessibility to transit and an increase in the diversity of uses and density, both of which serve to reduce VMT. These Project characteristics are explained further in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

Table IV.A-7 on page IV.A-64 provides the Project's operational emissions with the incorporation of Project design features. As shown in Table IV.A-7, regional emissions resulting from operation of the Project would not exceed SCAQMD's daily regional operational thresholds. **Therefore, the regional operational emissions associated with the Project would result in less than significant impacts.**

The Specific Plan would provide development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Specifically, floor area from any permitted land use category may be exchanged for additional sound stage and production support uses as long as the limitations set forth in the Specific Plan are met. In addition, the total permitted floor area on-site must not exceed 1,874,000 square feet, and the sitewide floor area ratio must not exceed 1.75:1. For more information about

Table IV.A-6
Estimated Maximum Daily Regional Project Construction Emissions[a]
(pounds per day)

Construction Year	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Construction Emissions						
2023	16	296	163	1	66	26
2024	12	246	125	1	53	22
2025	72	44	132	<1	34	10
2026	66	24	70	<1	19	6
Maximum Construction Emissions	72	296	163	1	66	26
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(3)**	**196**	**(387))**	**(149)**	**(84)**	**(29)**
Maximum Construction Emissions Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

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

Source: Eyestone Environmental, 2021.

the land use exchange component of the Specific Plan, see Section IV.H, Land Use and Planning, of this Draft EIR. Table IV.A-7 on page IV.A-64 also provides the land use mix under the land use exchange program that would generate the highest potential regional operational emissions. As shown in Table IV.A-7, **regional emissions from this land use exchange would result in an increase in operational emissions but would not exceed SCAQMD's daily regional operational thresholds, and impacts would be less than significant.**

(b) Localized Emissions

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

(i) Construction

As analyzed under Threshold (c) below and detailed in Table IV.A-9 on page IV.A-69 further below, maximum construction emissions would not exceed the SCAQMD-recommended LSTs for CO and NO_X. However, maximum construction emissions would exceed the SCAQMD-recommended LSTs for PM_{10} and $PM_{2.5}$ primarily as a result of

Table IV.A-7
Estimated Maximum Regional Daily Operational Emissions at Project Buildout (2026)[a]

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project (Conceptual Land Use Program)						
Area	26	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	4	3	<1	<1	<1
Mobile	18	18	165	<1	40	11
Emergency Generators	<1	(<1)	(<1)	(<1)	(<1)	(<1)
Paint Spray Booths[b]	<1	<1	<1	<1	<1	<1
Total Proposed Uses Emissions	45	20	168	<1	40	11
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(10)	(35)	(382)	(149)	(110)	(44)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project (Land Use Exchange—Maximum Air Emissions)[c]						
Area	26	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	4	3	<1	<1	<1
Mobile	21	21	200	<1	48	13
Emergency Generators	<1	(<1)	(<1)	(<1)	(<1)	(<1)
Paint Spray Booths[c]	<1	<1	<1	<1	<1	<1
Total Proposed Uses Emissions[c]	48	23	204	<1	48	13
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(7)	(32)	(346)	(149)	(102)	(42)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR. The table reflects net emissions (i.e., Project emissions less existing emissions).*

[b] *The existing spray paint booths will be removed as part of the Project. Given the nature and logistics of production activities in newer studio facilities and their usage at Manhattan Beach Studios, spray paint booth usage is assumed herein not to increase as a result of the Project. Furthermore, any new spray paint booths at the Project Site would include the most up-to-date equipment, which would comply with SCAQMD requirements (e.g., more efficient paint sprayers and HEPA filtration) and SCAQMD permit conditions.*

[c] *As discussed in Section II, Project Description, of this Draft EIR, the Specific Plan would provide development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Under the land use mix that generates maximum air emissions, the Project would exchange 100,000 square feet of production support for 100,000 square feet of sound stages. Under this development scenario, all impacts would remain less than significant.*

Source: Eyestone Environmental, 2022.

demolition and excavation/grading activities. **Therefore, localized construction emissions associated with the Project would result in a potentially significant impact.**

(ii) Operations

Project-related operational emissions were also evaluated based on SCAQMD LST methodology. The SCAQMD LST methodology addresses emissions from on-site sources (e.g., water heaters, cooking appliances, HVAC). As shown below, Project-related operational emissions from on-site and off-site sources would not exceed the LSTs. **Therefore, localized operational emissions associated with the Project would result in less than significant impacts.**

(2) Mitigation Measures

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

Mitigation Measure AIR-MM-1: Prior to demolition, a Project representative shall make available to the City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that, with the exception of demolition activities, will be used during any portion of construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board (CARB) or SCAQMD operating permit shall be available on-site at the time of mobilization of each applicable unit of equipment to allow a Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the construction inventory list described above shall meet the United States Environmental Protection Agency (USEPA) Tier 4 Final standards.

Mitigation Measure AIR-MM-2: The Project's truck operator(s)/construction contractor(s) shall commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/brake horsepower (bhp)-hr for particulate matter and 0.20 g/bhp-hr of nitrogen oxide emissions or newer, cleaner trucks for haul trucks associated with demolition and grading/excavation activities and concrete delivery trucks during concrete mat foundation pours. To monitor and ensure 2010 model year or newer trucks are used during

Project construction, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities and make these records available to the Lead Agency during the construction process upon request.

Mitigation Measure AIR-MM-3: Construction staging areas shall be located as far away as feasible from adjacent residential uses.

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

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

(3) Level of Significance After Mitigation

(a) Construction

Implementation of the mitigation measures described above would reduce construction emissions. Table IV.A-8 on page IV.A-67 provides the peak daily mitigated regional emissions by construction year. As presented in Table IV.A-8, with the implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4, peak daily regional NO_X emissions would be reduced but would still exceed the SCAQMD regional threshold of 100 pounds per day. **As such, Project construction would result in a significant Project-level and cumulative impact related to regional NO_X emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable.**

Implementation of the mitigation measures described above would reduce construction emissions. Table IV.A-11 on page IV.A-74 further below provides the peak daily mitigated localized emissions by construction year. As presented therein, with the implementation of Mitigation Measure AIR-MM-1 (which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards) and Mitigation Measure AIR-MM-2 (which requires the use of 2010 model year or newer engines that meet CARB's 2010 engine emission standards for haul trucks associated with demolition and grading/excavation activities and concrete delivery trucks during concrete mat foundation pours), peak daily localized emissions would be reduced to below the SCAQMD LST thresholds. **As such, Project construction would result in less-than-significant Project-level and cumulative localized impacts with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4.**

Table IV.A-8
Estimated Maximum Regional Project Daily Construction (Mitigated) Emissions (pounds per day)[a]

Construction Year	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Construction Emissions						
2023	8	205	193	1	44	15
2024	6	185	150	1	38	13
2025	69	18	136	<1	33	9
2026	64	10	72	<1	18	5
Maximum Mitigated Construction Emissions	69	205	193	1	44	15
SCAQMD Daily Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	**(6)**	**105**	**(357)**	**(149)**	**(106)**	**(40)**
Maximum Unmitigated Construction Emissions Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

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

Source: Eyestone Environmental, 2022.

(b) Operation

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

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

(1) Impact Analysis

(a) Construction

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

The localized construction air quality analysis was conducted using the methodology promulgated by SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[80] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard

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

and are based on the most recent background ambient air quality monitoring data (2018–2020) for the Project area, presented in Table IV.A-2 on page IV.A-28. Although the trend shown in Table IV.A-2 demonstrates that ambient air quality is improving in the area, the localized construction emissions analysis conservatively does not apply a reduction in background pollutant concentrations for subsequent years of construction (i.e., 2023–2026). By doing so, the allowable pollutant increment to not exceed an ambient air quality standard is more stringent.

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the area (SRA 1) based on a construction site acreage of five acres. As discussed above, although the construction site exceeds five acres and would have active overlapping construction activities that exceed five acres, it was conservatively assumed that all on-site emissions would occur within a 5-acre area. This approach is recommended by SCAQMD for a screening-level analysis and conservatively over-predicts potential localized impacts, since more pollutant emissions would occur within a smaller area (i.e., more pollutant emissions per square meter) and in closer proximity to potential sensitive receptors.[81] Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residential uses located directly east of the Project Site boundary. The 25-meter distance is conservative as the vast majority of construction activities would be located further away from the property boundary.

The maximum daily localized emissions from Project construction and LSTs are presented in Table IV.A-9 on page IV.A-69. As shown therein, maximum construction emissions would exceed the SCAQMD-recommended localized screening thresholds for PM_{10} and $PM_{2.5}$. **As a result, localized construction emissions resulting from the Project would result in a potentially significant impact.**

(ii) Toxic Air Contaminants

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, the health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 32 months (2.5 years), the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Furthermore, implementation of

[81] Telephone Conversation, Ian MacMillan, SCAQMD CEQA Program Supervisor, November 10, 2011.

Table IV.A-9
Estimated Maximum Localized Daily Project Construction Emissions[a]
(pounds per day)

Construction Year	NO_X	CO	PM_{10}	$PM_{2.5}$
2023	106	101	32	16
2024	73	71	23	13
2025	32	48	1	1
2026	18	26	1	1
Maximum Unmitigated Daily Localized Emissions	106	101	32	16
SCAQMD Localized Significance Thresholds[b]	**221**	**1,531**	**16**	**8**
Over/(Under)	**(115)**	**(1,430)**	**16**	**8**
Exceed Threshold?	**No**	**No**	**Yes**	**Yes**

Numbers may not add up exactly due to rounding.

[a] *Potential localized construction impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 1.*

[b] *The SCAQMD Daily Significance Thresholds are conservatively based on a 5-acre Project Site. The closest sensitive receptors are residential uses east of the Project Site. The localized threshold is based on a 25-meter receptor distance, which is the closest receptor distance on the SCAQMD mass rate LST look-up table.*

Source: Eyestone Environmental, 2021.

Mitigation Measure AIR-MM-1 (which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards) would result in an approximately 95-percent reduction in diesel particulate matter emissions in comparison to Tier 3 standards. Additionally, the SCAQMD CEQA Air Quality Handbook does not provide guidance requiring a health risk assessment (HRA) for short-term construction emissions.[82] Therefore, it is not necessary to evaluate long-term cancer impacts from construction activities, which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. **As such, Project-related TAC impacts during construction would be less than significant.**

(b) Operation

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

Operation of the Project would not introduce any major new sources of air pollution within the Project Site, as the proposed uses would be similar in nature to the existing uses on-site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table IV.A-10 on page IV.A-70. The SCAQMD LST mass rate look-up tables, which

[82] SCAQMD, CEQA Air Quality Handbook, Chapter 10, Assessing Toxic Air Pollutants, 1993.

Table IV.A-10
Estimated Maximum Localized Daily Operational Emissions at Project Buildout (2026)[a]
(pounds per day)

Emission Source	NO_X	CO	PM_{10}	$PM_{2.5}$
Project (Conceptual Land Use Program)				
Area	<1	<1	<1	<1
Energy (Natural Gas)	2	3	<1	<1
Stationary (Emergency Generators)	<1	(<1)	(<1)	(<1)
On-Site Total	**1.9**	**3.0**	**0.2**	**0.2**
SCAQMD Significance Threshold[b]	**221**	**1,531**	**3**	**2**
Over/(Under)	**(219)**	**(1,528)**	**(3)**	**(2)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Project (Land Use Exchange—Maximum Air Emissions)[c]				
Area	<1	<1	<1	<1
Energy (Natural Gas)	2	3	<1	<1
Stationary (Emergency Generators)	<1	(<1)	(<1)	(<1)
On-Site Total[a]	**2.2**	**3.2**	**0.2**	**0.2**
SCAQMD Significance Threshold[b]	**221**	**1,531**	**3**	**2**
Over/(Under)	**(219)**	**(1,528)**	**(3)**	**(2)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR. The table reflects net emissions (i.e., Project emissions less existing emissions).*

[b] *The SCAQMD Daily Significance Thresholds are conservatively based on a 5-acre Project Site. The closest sensitive receptors are residential uses immediately east of the Project Site. The localized threshold is based on a 25-meter receptor distance, which is the closest receptor distance on the SCAQMD mass rate LST look-up table.*

[c] *As discussed in Section II, Project Description, of this Draft EIR, the Specific Plan would provide development flexibility by allowing for exchanges between certain categories of permitted land uses and associated floor areas in order to respond to the future needs and demands of the entertainment industry. Under the land use mix that generates maximum air emissions, the Project would exchange 100,000 square feet of production support for 100,000 square feet of sound stages. Under this development scenario, all impacts would remain less than significant.*

Source: Eyestone Environmental, 2022.

apply to projects that have active areas that are less than or equal to five acres in size, were used to evaluate potential localized impacts. As shown in Table IV.A-10, on-site operational emissions would not exceed any of the LSTs. **Therefore, localized on-site operational emissions associated with the Project would result in a less-than-significant air quality impact.**

Table IV.A-10 on page IV.A-70 also provides the land use mix under the land use exchange program that would generate the highest potential localized operational emissions. **As shown in Table IV.A-10, localized emissions from the maximum-demand land use exchange would result in a slight increase in localized operational emissions but would not exceed the SCAQMD's daily localized operational thresholds, and impacts would be less than significant.**

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

Consistent with the CO methodology above, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. At Project buildout, the highest average number of daily trips at an intersection would be approximately 65,260 trips at La Brea Avenue and Beverly Boulevard, which is substantially below the daily traffic volumes expected to generate CO exceedances as evaluated in the 2003 AQMP.[83,84] This daily trip estimate is based on peak-hour conditions at the intersection, representing 10 percent of the total daily trips. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the La Brea Avenue and Beverly Boulevard intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP and discussed above.[85] **Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.** The supporting data for this analysis is included in Appendix B of this Draft EIR.

(iii) Toxic Air Contaminants

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors in close proximity to land uses that emit TACs. CARB published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of TAC emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing

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83 Gibson Transportation Consulting, Inc., Transportation Assessment for the Television City 2050 Specific Plan Project, October 2021.

84 The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.

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

facilities).[86] SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.[87] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential TACs associated with Project operations include diesel particulate matter from delivery and production trucks and, to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. SCAQMD recommends that HRAs be conducted for substantial individual sources of diesel particulate matter (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[88] The Project would not include these types of land uses and is not considered to be a substantial source of diesel particulate matter warranting an HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions. Furthermore, there are no substantial sources of TACs within the Project vicinity.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) typical for the types of proposed land uses would be below the thresholds warranting further study under the California Accidental Release Program (CalARP). As such, the Project would not release substantial amounts of TACs, and impacts on human health would be less than significant.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic

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

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

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

hazard index of 1.0. As such, the Project would not expose sensitive receptors to substantial pollutant concentrations, and potential TAC impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

(a) Construction

Implementation of the mitigation measures described above would reduce construction emissions for pollutant emissions. Table IV.A-11 on page IV.A-74 provides the peak daily mitigated localized emissions by construction year. As presented in Table IV.A-11, with the implementation of Mitigation Measure AIR-MM-1 (which requires the use of off-road diesel-powered construction equipment meeting Tier 4 Final standards) and Mitigation Measure AIR-MM-2 (which requires the use of 2010 model year or newer engines that meet CARB's 2010 engine emission standards for haul trucks associated with demolition and grading/excavation activities and concrete delivery trucks during concrete mat foundation pours), peak daily localized emissions would be reduced below the SCAQMD LST thresholds. **As such, Project construction would result in less-than-significant Project-level and cumulative localized impacts with the incorporation of Mitigation Measures AIR-MM-1 and AIR-MM-2.**

(b) Operation

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

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

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for this Project, included in Appendix A of this Draft EIR, no objectionable odors are anticipated to adversely affect a substantial number of

Table IV.A-11
Estimated Maximum Daily Localized Project Construction (Mitigated) Emissions[a]
(pounds per day)

Construction Year	NO_X	CO	PM_{10}	$PM_{2.5}$
2023	15	132	11	5
2024	12	96	8	4
2025	6	52	<1	<1
2026	4	28	<1	<1
Maximum Unmitigated Daily Localized Emissions	15	132	11	5
SCAQMD Localized Significance Thresholds[b]	**221**	**1,531**	**16**	**8**
Over/(Under)	**(206)**	**(1,399)**	**(8)**	**(3)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *Potential localized construction impacts were evaluated using SCAQMD's LSTs for Source Receptor Area 1.*

[b] *The SCAQMD Daily Significance Thresholds are based on a 5-acre Project Site. The localized threshold is based on a 25-meter receptor distance, which is the closest receptor distance on the SCAQMD mass rate LST look-up table.*

Source: Eyestone Environmental, 2021.

people as a result of either construction or operation of the Project. **Therefore, as determined in the Initial Study, potential odor impacts during construction and operation of the Project would be less than significant, and no further analysis is required.**

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring and Reporting Program (MMRP) throughout the term of the Development Agreement. The Specific Plan and MMRP would continue to regulate development of the Project site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. The following discussion addresses potential impacts associated with a long-term buildout.

From a construction standpoint, the overall amount of demolition, excavation/export, and square footage of building construction would not change. Thus, the use and types of equipment required for construction would be similar to that associated with a 2026

buildout. However, a long-term buildout would benefit from future improvements in equipment efficiencies, including more stringent regulatory requirements, that would reduce future air emissions during Project construction. Specifically, as previously discussed, based on SCAQMD factors, the construction equipment and truck fleet mix would emit less pollution in future years due to more stringent emissions control regulations. As construction air quality impacts are evaluated on a worst-case day, the shorter construction duration (2023–2026) would assume more intensive activities on a daily basis, as well as overlapping activities and construction phases. Therefore, as a conservative assumption, it was assumed that construction would be completed by 2026.

From an operational standpoint, a long-term buildout would also result in an overall reduction in operational emissions due to more stringent requirements in the future. As an example, Title 24 requirements apply to projects based on the date when a building permit is issued. Thus, buildings constructed at a later date would be required to comply with subsequent versions of Title 24, which typically include increasingly stringent energy conservation requirements and associated reductions in energy use.[89] In addition, Governor Gavin Newsom signed Executive Order No. N-79-20 on September 23, 2020, which will phase out sales of new gas-powered passenger cars in California by 2035, with an additional 10-year transition period for heavy vehicles. With more stringent fuel economy requirements in subsequent years, fuel usage associated with the Project would similarly decrease. As such, a long-term buildout would reduce the Project's operational emissions.

Extending the full buildout year to approximately 2043 also has the potential to result in concurrent construction and operational activities. Analysis of these concurrent activities were considered in five-year increments, and construction activities were conservatively assumed to occur at approximately 50 percent of the maximum daily intensity as would occur during the shorter construction duration (2023–2026).[90] As shown in Table IV.A-12 on page IV.A-76, regional NO_X and VOC emissions would exceed the SCAQMD regional operational significance threshold (55 pounds per day) and result in a significant and

[89] For example, single-family homes built with the 2019 Title 24 Standards are estimated to use approximately seven percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once the mandated rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. Nonresidential buildings are projected to use approximately 30 percent less energy than 2016 standards due mainly to lighting upgrades.

[90] For example, Project buildout by 2026 would require two separate excavation operations. With a long-term buildout and operation of some facilities on-site while construction is occurring, only a single excavation operation could be accommodated on-site, thus reducing the excavation activities and associated haul truck trips by half. Other construction activities such as building construction and finishing would likely occur at a further reduced level.

Table IV.A-12
Estimated Maximum Daily Regional Emissions from Project Concurrent Construction (Mitigated) and Operations

Analysis Year	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Year 2026 (20% Buildout of Conceptual Land Use Program)						
Construction (2026–2029 Max Daily)	34	101	96	1	22	7
Operation	31	19	108	<1	26	7
Total	**64**	**120**	**204**	**1**	**48**	**15**
Year 2030 (40% Buildout of Conceptual Land Use Program)						
Construction (2030–2033 Max Daily)	33	97	95	1	22	7
Operation	33	18	112	<1	29	8
Total	**66**	**114**	**208**	**1**	**51**	**15**
Year 2035 (60% Buildout of Conceptual Land Use Program)						
Construction (2035–2038 Max Daily)	33	93	95	1	22	7
Operation	36	16	119	<1	33	9
Total	**68**	**109**	**214**	**1**	**55**	**16**
Year 2040 (80% Buildout of Conceptual Land Use Program)						
Construction (2040–2043 Max Daily)	**32**	91	95	<1	22	7
Operation	38	15	129	<1	36	10
Total	**71**	**107**	**224**	**1**	**59**	**17**
Year 2043 (100% Buildout of Conceptual Land Use Program)						
Construction	0	0	0	0	0	0
Operation	42	15	141	<1	40	11
Total	**42**	**15**	**141**	**<1**	**40**	**11**
Max Daily Concurrent Emissions[a]	**71**	**120**	**224**	**1**	**59**	**17**
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	16	**65**	(326)	(149)	(91)	(38)
Exceed Threshold?	**Yes**	**Yes**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

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

Source: Eyestone Environmental, 2022.

unavoidable air quality impact. The maximum daily concurrent construction (mitigated) and operational VOC emissions (71 pounds per day) would increase by approximately two pounds in comparison to the maximum daily construction (mitigated) regional emissions (69 pounds per day) presented in Table IV.A-8 on page IV.A-67. It should be noted that the maximum daily concurrent construction (mitigated) and operational VOC emissions would not exceed the SCAQMD regional construction threshold (75 pounds per day). While the maximum daily concurrent construction (mitigated) and operational NO_X

emissions (118 pounds per day) would exceed the operational SCAQMD regional significance threshold, NO_X emissions would remain less than the maximum mitigated daily construction NO_X emission (200 pounds per day), as) presented in Table IV.A-8 on page IV.A-67.

As shown in Table IV.A-13 on page IV.A-78, concurrent construction (mitigated) and operational localized emissions would not exceed SCAQMD LSTs. Thus, the Project's concurrent construction and operations would result in less-than-significant localized impacts with the incorporation of feasible mitigation. In addition, no changes to the proposed Project design feature or mitigation measures would be necessary in the event of an extended buildout, except as needed to comply with future new or updated regulatory standards.

f. Cumulative Impacts

(1) Impact Analysis

(a) Construction

Based on SCAQMD guidance, individual construction projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.[91] As discussed above under Thresholds (b) and (c) above, the Project's construction-related TAC emissions would be less than significant, and localized criteria pollutant emissions would be less than significant with the incorporation of mitigation measures. However, the Project's construction-related regional emissions of NO_X would be significant and unavoidable even with the incorporation of feasible mitigation measures. 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.[92] **As Project construction emissions would exceed SCAQMD's regional significance threshold for NO_X, the emissions of non-attainment pollutants and precursors generated by Project construction would be cumulatively considerable.**

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

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

Table IV.A-13
Estimated Maximum Daily Localized Emissions from Project Concurrent Construction (Mitigated) and Operations[a]

Analysis Year	Pollutant Emissions (pounds per day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Year 2026 (20% Buildout of Conceptual Land Use Program)				
Construction (2026–2029 Max Daily)	7	66	6	2
Operation	8	5	<1	<1
Total	**15**	**71**	**6**	**3**
Year 2030 (40% Buildout of Conceptual Land Use Program)				
Construction (2030–2033 Max Daily)	7	66	6	2
Operation	6	4	<1	<1
Total	**13**	**70**	**6**	**3**
Year 2035 (60% Buildout of Conceptual Land Use Program)				
Construction (2035–2038 Max Daily)	7	66	6	2
Operation	4	3	<1	<1
Total	**11**	**69**	**6**	**3**
Year 2040 (80% Buildout of Conceptual Land Use Program)				
Construction (2040–2043 Max Daily)	7	66	6	2
Operation	2	2	<1	<1
Total	**9**	**68**	**6**	**3**
Year 2043 (100% Buildout of Conceptual Land Use Program)				
Construction	0	0	0	0
Operation	<1	1	<1	<1
Total	**<1**	**1**	**<1**	**<1**
Max Daily Concurrent Emissions[a]	**15**	**71**	**6**	**3**
SCAQMD Significance Threshold	221	1,531	16	8
Over/(Under)	(206)	(1,460)	(10)	(5)
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

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

Source: Eyestone Environmental, 2022.

(b) Operation

As discussed above, the Project's operational regional and localized emissions would be less than significant. TAC emissions would also remain less than significant. **Therefore, the Project's contribution to cumulative operational air quality impacts would not be cumulatively considerable.**

(c) Long-Term Buildout

As discussed above, the Project's concurrent construction and operational regional emissions of NO_X and VOC emissions would be significant and unavoidable even with the incorporation of feasible mitigation measures. According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.[93] **As the Project's concurrent construction and operational-related emissions would exceed the SCAQMD's regional significance threshold for NO_X and VOC emissions, the emissions of non-attainment pollutants and precursors under the long-term Project buildout scenario would be cumulatively considerable.**

(2) Mitigation Measures

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

Operational impacts related to air quality would not be cumulatively considerable, and no mitigation measures are required.

(3) Level of Significance After Mitigation

As shown in Table IV.A-8 on page IV.A-67, despite implementation of Mitigation Measures AIR-MM-1 and AIR-MM-2, Project construction would result in a significant and unavoidable Project-level and cumulative regional air quality impact related to NO_X. As shown in Table IV.A-11 on page IV.A-74, the Project's construction-related localized PM_{10} and $PM_{2.5}$ emissions would be reduced to less-than-significant levels with the incorporation of Mitigation Measures AIR-MM-1 through AIR-MM-4. Therefore, cumulative construction-related localized impacts would likewise be less than significant with mitigation. With regard to cumulative TAC emissions during construction, no mitigation measures were required or included, and the impact level remains less than significant.

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

As shown in Table IV.A-7 on page IV.A-64 and Table IV.A-10 on page IV.A-70, the Project's operational impacts were determined to be less than significant without mitigation and, thus, cumulative operational impacts would be less than significant without mitigation. Cumulative impacts related to operational TAC emissions also would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

As shown in Table IV.A-12 on page IV.A-76, with the implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4, the Project's emissions during possible concurrent construction and operations would result in significant and unavoidable Project-level and cumulative regional air quality impacts related to NO_X and VOC. No mitigation measures were required or included with respect to Project-level or cumulative localized impacts during possible concurrent construction and operations, and such impacts would remain less than significant.

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

In response to the California Supreme Court decision on December 24, 2018, *Sierra Club v. County of Fresno* (*Friant Ranch*), the City prepared a guidance document (Air Quality and Health Effects (*Sierra Club v. County of Fresno*)), that addresses the potential for identifiable health impacts to result from air pollutants analyzed in City environmental documents prepared pursuant to CEQA.[94] The discussion focuses on significant impacts identified in City EIRs and the feasibility of directly relating any identified significant adverse air quality impact to likely health consequences.

The California Supreme Court opinion in Friant Ranch requires projects with significant air quality impacts to "relate the expected adverse air quality impacts to likely health consequences or explain why it is not feasible at the time of drafting to provide such an analysis, so that the public may make informed decisions regarding the costs and benefits of the project."[95] The Friant Ranch decision also states that providing "only a general description of symptoms that are associated with exposure"... "fail[s] to indicate the concentrations at which such pollutants would trigger the identified symptoms...." and "the public would have no idea of the health consequences that result when more pollutants are added to a nonattainment basin."

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94 City of Los Angeles, Air Quality Health Effects (*Sierra Club v. County of Fresno*), October 2019.

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

The City's guidance document provides information to the public regarding the health consequences associated with exposure to air pollutants and explains why direct correlation of a project's pollutant emissions and anticipated health effects is currently infeasible, as no expert agency has approved a quantitative method to reliably and meaningfully translate mass emission estimates of criteria air pollutants to specific health effects for the scale of projects typically analyzed in City EIRs.[96]

In the case of the Project, the regional construction emissions would exceed SCAQMD's recommended daily significance thresholds for NO_X.[97] However, this does not mean that a concentration of O_3 would be created at or near the Project Site on a particular day or month of the year or that any specific human health impacts may occur from such an exceedance. As discussed in the City's guidance document, meteorology, the presence of sunlight, and other complex chemical factors all combine to determine the ultimate concentrations and locations of O_3. In addition, it would not be feasible to model with any degree of reliability or certainty the impact on attainment of the ambient air quality standards that these Project emissions which exceed regional thresholds may have. The currently available tools are equipped to model the impact of all emission sources in an air basin on attainment but lack the resolution to reliably model O_3 concentrations from smaller sources of O_3 precursors, such as individual projects. Therefore, O_3 modeling for individual projects would not be feasible or provide meaningful data to assess health impacts.

From a scientific standpoint, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient O_3 levels over an entire region. SCAQMD's 2012 AQMP showed that reducing baseline year 2008 NO_X by 432 tons per day and reducing VOC by 187 tons per day would only reduce O_3 levels at SCAQMD's monitoring site with the highest levels by only nine parts per billion (ppb). This is a relatively immaterial change in local O_3 concentrations for a large decrease in regional O_3 precursors (NOx and VOCs).[98] SCAQMD also conducted pollutant modeling for proposed Rule 1315 in which the CEQA analysis accounted for essentially all of the increases in emisssions due to new or modified sources in the SCAQMD between 2010 and 2030, or approximately 6,620 pounds per day of NO_X and 89,947 pounds per day of VOC. The results of the analysis showed that this increase of regional pollutant emissions would contribute to a small increase in the Air Basin-wide O_3 concentrations in 2030 by 2.6 ppb

96 City of Los Angeles, Department of City Planning, Air Quality and Health Effects, October 2019.

97 Under a long-term buildout scenario, concurrent construction and operational emissions would exceed SCAQMD's recommended daily significance thresholds for NO_X and VOC.

98 SCAQMD, Final 2012 AQMP, February 2013, www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan; Appendix V: Modelling & Attainment Demonstrations, pp. v-4-2, v-7-4, v-7-24.

and less than one ppb of NO_2. Again, this is a relatively immaterial increase in O_3 concentrations despite the expected very large increase in regional O_3 precursors.

Based on information provided in the City's guidance document, the Project would fall within the scope of a "typical City project," since the estimated maximum daily construction regional NO_X emissions of 105 pounds per day over SCAQMD's signficance threshold represent approximately 1.5 percent of the emissions analyzed by SCAQMD related to Rule 1315, respectively.[99] Running the regional-scale photochemical grid model used for predicting O_3 attainment with the emissions from the Project (which equates to approximately four-tenths of one percent of the VOC and NO_X in the air basin) would not yield reliable information regarding a measurable increase in O_3 concentrations sufficient to accurately quantify the Project's O_3-related health impacts. Any modeled increase in O_3 concentrations would not be useful for meaningful analysis, as the increase would be so comparatively small that it would be well within the error margins of such models. Based on this information, a general description of the adverse health impacts resulting from the pollutants at issue is all that can be feasibly provided at this time. Please see Appendix B of the City's guidance document for a discussion of general adverse health impacts resulting from NO_X.

[99] Under a long-term buildout scenario, concurrent construction (mitigated) and operational regional emissions (approximately 63 pounds of NO_X and approximately 16 pounds of VOC per day) over SCAQMD's signficance threshold would represent approximately 0.9 percent of NO_X emissions and approximately 0.02 percent of VOC emissions analyzed by SCAQMD related to Rule 1315.