

IV. Environmental Impact Analysis

B. Air Quality

1. Introduction

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Project and whether Project emissions would conflict with or obstruct implementation of the applicable air quality plan; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions, such as those leading to odors, affecting a substantial number of people. This section relies on information included in Appendix C.1 and C.2 of this Draft EIR.

2. Environmental Setting

a. Air Quality Background

(1) Air Quality and Public Health

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

¹ USEPA, NAAQS Table, www.epa.gov/criteria-air-pollutants/naaqs-table, accessed June 27, 2022.

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.² The NAAQS and CAAQS are listed in Table IV.B-1 on page IV.B-3.

At the regional level, the South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside, and San Bernardino Counties, including the Coachella Valley.³ The Site Locations are located on Metro-owned property within the City of Los Angeles (City), which is located within the South Coast Air Basin (Air Basin). The Air Basin 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

The Site Locations are located on Metro-owned property within the City, which is located within the South Coast Air Basin, an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is considered semi-arid and is characterized by warm

² SCAQMD, *Final 2016 AQMP, 2017, Appendix I-69*.

³ SCAQMD, *Map of Jurisdiction, 1999*.

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

Pollutant	Averaging Period	Federal Standard ^{a,b}	California Standard ^{a,b}	SCAQMD Attainment Status ^c	
				California Standard ^d	Federal Standard ^d
Ozone (O ₃)	1 hour	—	0.09 ppm (180 µg/m ³)	Non-Attainment	—
	8 hour	0.070 ppm (137 µg/m ³)	0.07 ppm (137 µg/m ³)	Non-Attainment	Non-Attainment (Extreme)
Respirable Particulate Matter (PM ₁₀)	24 hour	150 µg/m ³	50 µg/m ³	Non-Attainment	Attainment
	Annual	—	20 µg/m ³		
Fine Particulate Matter (PM _{2.5})	24 hour	35 µg/m ³	—	Non-Attainment	Non-Attainment (Serious)
	Annual	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)	Attainment	Unclassified/ Attainment
	Annual	0.053 ppm (100 µg/m ³)	0.030 ppm (57 µg/m ³)		
Sulfur Dioxide (SO ₂)	1 hour	0.075 ppm (196 µg/m ³)	0.25 ppm (655 µg/m ³)	Attainment	Unclassified/ Attainment
	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	Attainment	Partial Non- Attainment ^e
	Rolling 3-month average	0.15 µg/m ³	—		
Sulfates	24 hour	—	25 µg/m ³	Attainment	—
Hydrogen Sulfide (H ₂ S)	1 hour	—	0.03 ppm (42 µg/m ³)	Unclassified	—

ppm = parts per million by volume

µg/m³ = micrograms per cubic meter

^a An ambient air quality standard is a concentration level expressed in either parts per million or micrograms per cubic meter and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are

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

Pollutant	Averaging Period	Federal Standard ^{a,b}	California Standard ^{a,b}	SCAQMD Attainment Status ^c	
				California Standard ^d	Federal Standard ^d
<p><i>expressed as a concentration that is not to be equaled or exceeded.</i></p> <p>^b <i>Ambient Air Quality Standards based on the 2016 AQMP.</i></p> <p>^c <i>“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.</i></p> <p>^d <i>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.</i></p> <p>^e <i>An attainment re-designation request is pending.</i></p> <p><i>Source: United States Environmental Protection Agency, NAAQS Table, www.epa.gov/criteria-air-pollutants/naaqs-table, accessed June 27, 2022; CARB, Ambient Air Quality Standards, May 4, 2016.</i></p>					

summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

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

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

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

(3) Air Pollutant Types

(a) Criteria Pollutants

The six principal pollutants for which national and State criteria and standards have been promulgated, known as “criteria pollutants,” and which are most relevant to current air quality planning and regulation in the Air Basin include: ozone (O₃), respirable and fine particulate matter (PM₁₀ and PM_{2.5}, respectively), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted for them.

(i) Ozone (O₃)

O₃ is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O₃ irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

(ii) Particulate Matter (PM₁₀ and PM_{2.5})

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter, PM₁₀ and PM_{2.5},

consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, such as pollen and windstorms, are naturally occurring. However, in urban areas, such as the City, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. The human body naturally prevents the entry of larger particles into the body. However, small particles can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM₁₀ and PM_{2.5}. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

(iii) Carbon Monoxide (CO)

CO is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. In urban areas, such as the City, automobile exhaust accounts for the majority of CO emissions. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O₃, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

(iv) Nitrogen Dioxide (NO₂)

NO₂ 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, NO₂ is the most abundant in the atmosphere. As ambient concentrations of NO₂ are related to traffic density, commuters in heavy traffic areas, particularly in urban areas, such as the City of Los Angeles, may be exposed to higher concentrations of NO₂ than those indicated by regional monitors. NO₂ absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO₂ also contributes to the formation of PM₁₀. NO_x 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 O₃.

(v) Sulfur Dioxide (SO₂)

Sulfur oxides (SO_x) are compounds of sulfur and oxygen molecules. SO₂ is the predominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO₂ are found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. Emissions of SO₂ aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO₂, and long-term exposures to both pollutants 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 air are usually found near lead smelters. The major sources of Pb emissions to the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Pb is also emitted from the sanding or removal of old lead-based paint (LBP). Pb emissions are primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

(b) Additional Criteria Pollutants (California Only)

In addition to the national standards, the State of California regulates State-identified criteria pollutants, including sulfates (SO₄²⁻), hydrogen sulfide (H₂S), visibility-reducing particles, and vinyl chloride. With respect to the State-identified criteria pollutants, most land use development projects either do not emit them (i.e., H₂S (nuisance odor) and vinyl chloride), or otherwise account for these pollutants (i.e., SO₄²⁻ and visibility reducing particles) through other criteria pollutants. For example, SO₄²⁻ are associated with SO_x emissions, and visibility-reducing particles are associated with particulate matter emissions. A description of the health effects of the State-identified criteria air pollutants is provided below.

(i) Sulfates (SO₄²⁻)

SO₄²⁻ are the fully oxidized ionic form of sulfur. SO₄²⁻ occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain

sulfur. This sulfur is oxidized during the combustion process and subsequently converted to 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.⁴ Exposure to H_2S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.⁵ H_2S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.⁶

(iii) Visibility-Reducing Particles

Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size, and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., sulfates, nitrates, organic carbon particles) which are the major constituents of particulate matter. As the number of visibility-reducing particles increases, more light is absorbed and scattered, resulting in less clarity,

⁴ California Air Resources Board, *Hydrogen Sulfide & Health*, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed June 27, 2022.

⁵ California Air Resources Board, *Hydrogen Sulfide & Health*, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed June 27, 2022.

⁶ California Air Resources Board, *Hydrogen Sulfide & Health*, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed June 27, 2022.

color, and visual range.⁷ Exposure to some haze-causing pollutants have been linked to adverse health impacts similar to PM₁₀ and PM_{2.5}, as discussed above.⁸

(iv) Vinyl Chloride

Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products and is generally emitted from industrial processes. Other major sources of vinyl chloride have been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.⁹ Short-term health effects of exposure to high levels of vinyl chloride in the air include central nervous system effects, such as dizziness, drowsiness, and headaches while long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage and has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.¹⁰ Most health data on vinyl chloride relate to carcinogenicity; thus, the people most at risk are those who have long-term exposure to elevated levels, which is more likely to occur in occupational or industrial settings. However, control methodologies applied to industrial facilities generally prevent emissions to the ambient air.¹¹

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

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

(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

⁷ California Air Resources Board, *Visibility-Reducing Particles and Health*, last reviewed October 11, 2016, www.arb.ca.gov/research/aaqs/common-pollutants/vrp/vrp.htm, accessed June 27, 2022.

⁸ California Air Resources Board, *Visibility-Reducing Particles and Health*, last reviewed October 11, 2016, www.arb.ca.gov/research/aaqs/common-pollutants/vrp/vrp.htm, accessed June 27, 2022.

⁹ California Air Resources Board, *Vinyl Chloride & Health*, ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed June 27, 2022.

¹⁰ California Air Resources Board, *Vinyl Chloride & Health*, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed June 27, 2022.

¹¹ California Air Resources Board, *Vinyl Chloride & Health*, ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed June 27, 2022.

processes by which such criteria pollutants as O₃, NO₂, and certain fine particles are formed. They are, therefore, regulated as “precursors” to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (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 (CCA)
 - National Ambient Air Quality Standards (NAAQS)
- California Clean Air Act (CCAA)
 - California Ambient Air Quality Standards (CAAQS)
- California Code of Regulations (CCR)
- State Programs for Toxic Air Contaminants
- Diesel Risk Reduction Program

- South Coast Air Quality Management District (SCAQMD)'s Air Quality Management Plan (AQMP) and Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- SCAQMD's Air Quality Guidance Documents
- SCAQMD's Rules and Regulations
- Los Angeles County Metropolitan Transportation Authority (Metro)'s Green Construction Policy
- 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 most recent amendments occurring in 1990.¹² The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.¹³ The USEPA is responsible for the implementation and enforcement of the CAA, which establishes federal NAAQS, specifies future dates for achieving compliance, and requires the USEPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).¹⁴

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. Table IV.B-1 on page IV.B-3, shows the NAAQS currently in effect for each

¹² 42 United States Code §7401 et seq. (1970).

¹³ United States Environmental Protection Agency, *Summary of the Clean Air Act*, www.epa.gov/laws-regulations/summary-clean-air-act, accessed February 8, 2021.

¹⁴ United States Environmental Protection Agency, *Clean Air Act Overview, Clean Air Act Table of Contents by Title, Last Updated January 3, 2017*, www.epa.gov/clean-air-act-overview/clean-air-act-text, accessed February 8, 2021. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.

criteria pollutant. The Air Basin fails to meet national standards for O₃ and PM_{2.5} and lead, therefore, is considered a federal “non-attainment” area for these pollutants. In addition, Los Angeles County fails to meet the national standard for lead and, therefore, is considered a federal non-attainment area for lead.

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

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

(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 California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both State and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table IV.B-1 on page IV.B-3 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the State. As shown in Table IV.B-1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet State standards for O₃, PM₁₀, and PM_{2.5} and, therefore, is considered “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 5 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 AB 2588 Air Toxics “Hot Spots” program and 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, the ARB was required by law to determine if there is a need for further control, which moved us into the risk management phase of the program. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines* and the *Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

(3) Regional

The 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.

(a) Air Quality Management Plan and RTP/SCS

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The 2016 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O₃ and PM_{2.5} are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_x emissions¹⁵ sufficiently to meet the upcoming O₃ standard deadlines, as NO_x plays a critical role in the creation of O₃. The AQMP's strategy to meet the 8-hour O₃ standard in 2023 should lead to sufficient NO_x emission reductions to attain the 1-hour O₃ standard by 2022. Since NO_x emissions also lead to the formation of PM_{2.5}, the NO_x reductions needed to meet the O₃ standards will likewise lead to improvement of PM_{2.5} levels and attainment of PM_{2.5} standards.^{16,17}

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 adopted 2016–2040 RTP/SCS (2016–2040 RTP/SCS) Plan.¹⁸ SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to

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

¹⁶ Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2016 AQMP for detailed discussion).

¹⁷ SCAQMD, Final 2016 AQMP, 2017, p. ES-2, www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp, accessed February 8, 2021.

¹⁸ SCAG, Final 2016 RTP/SCS, 2016, <https://scag.ca.gov/resources-prior-plans>, accessed June 28, 2022.

transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and State air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities “conform” to, and are supportive of, the goals of regional and State air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG.¹⁹ The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 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, 16-percent growth in housing units, 23-percent growth in employment, and 8-percent growth in vehicle miles traveled between 2012 and 2031. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, State, and federal levels.²⁰

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 emissions reduction target of 19 percent. The 2020–2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

(b) SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the AQMD Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.²¹ 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

¹⁹ SCAQMD, *Final 2016 AQMP, 2017*, p. ES-2, www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp, accessed June 28, 2022.

²⁰ SCAQMD, *Figure 1-4 of the Final 2016 AQMP*, www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp, accessed June 28, 2022.

²¹ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

the *Air Quality Analysis Guidance Handbook*. While this process is underway, the SCAQMD has provided supplemental guidance on the SCAQMD website.²²

The SCAQMD has also adopted land use planning guidelines in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.²³ SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). 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.²⁴ The SCAQMD adopted additional guidance regarding PM_{2.5} emissions in a document called *Final Methodology to Calculate Particulate Matter (PM)_{2.5} and PM_{2.5} Significance Thresholds*.²⁵ The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

(c) SCAQMD Rules and Regulations

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

Regulation IV—Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-

²² SCAQMD, *Air Quality Analysis Guidance*, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#, accessed June 27, 2022.

²³ South Coast Air Quality Management District, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, 2005.

²⁴ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, June 2003 (revised July 2008).

²⁵ South Coast Air Quality Management District, *Final Methodology to Calculate Particulate Matter (PM)_{2.5} and PM_{2.5} Significance Thresholds*, 2006.

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.
- **Rule 402—Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403—Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM₁₀ emissions to less than 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation 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.

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.

(d) Los Angeles County Metropolitan Transportation Authority

Construction activities to complete the Project will be contracted by Metro. Therefore, construction contractors will be required to comply with the provisions of the Metro Green Construction Policy, which was adopted in 2011 to reduce harmful air pollutant emissions (particularly particulate matter NO_x).²⁶ The Green Construction Policy commits Metro to construction equipment requirements, construction BMPs, and implementation strategies for all construction projects performed on Metro properties or within Metro right-of-way (ROW):

- All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 4 off-road emissions standards at a minimum. In addition, if not already supplied with a factory-equipped diesel particulate filter, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB achieving no less than the equivalent of a Level 3 diesel emission control strategy.
- All on-road heavy-duty diesel trucks or equipment with a Gross Vehicle Weight Rating (GVWR) of 19,500 pounds or greater shall comply with USEPA 2007 on-road emission standards for PM and NO_x (0.01 g/bhp-hr. and 1.2 g/bhp-hr., respectively).
- Every effort shall be made to utilize grid-based electric power at any construction site, where feasible. Where access to the power grid is not available, onsite generators must:
 - Meet a 0.01 gram per brake-horsepower-hour standard for PM, or
 - Be equipped with BACT for PM emissions reductions.

²⁶ *Los Angeles County Metropolitan Transportation Authority (Metro), LACMTA Green Construction Policy, Adopted July 2011.*

- BMPs shall include, at a minimum:
 - Use of diesel particulate traps or BACT, as feasible;
 - Maintain equipment according to manufacturer’s specifications;
 - Restrict idling of construction equipment and on-road heavy-duty trucks to a maximum of five (5) minutes when not in use (CARB exceptions apply);
 - Maintain a buffer zone that is a minimum of 1,000 feet between truck traffic and sensitive receptors, where feasible;
 - Work with local jurisdictions to improve traffic flow by signal synchronization during construction hours, where feasible;
 - Configure construction parking to minimize traffic interference, where feasible;
 - Enforce truck parking restriction, where applicable;
 - Prepare haul routes that conform to local requirements to minimize traversing through congested streets or near sensitive receptor areas ;
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, as feasible;
 - Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable;
 - Use electric power in lieu of diesel power where available; and
 - Maintain traffic speeds on all unpaved areas at or below 15 mph.

All Metro construction project solicitations shall include provisions authorizing enforcement of the requirements of the Green Construction Policy. Contractors operating under Metro agreements shall provide certified statements and documentation ensuring that equipment and vehicles employed to complete construction activities conform to the requirements listed above.

(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' Mayoral Initiative the Green New Deal (Sustainable pLAn 2019) contain policies and programs for the protection of the environment and health through improved air quality. These serve to provide additional critical guidance for the betterment of public health for the region and City.

The most directly related of those plans, the City's General Plan Air Quality Element, was adopted on November 24, 1992, and sets forth the goals, objectives, and policies which guide the City in its implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies are relevant to 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.

c. Existing Conditions

(1) Regional Air Quality

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

The greatest degree of air pollution throughout the Air Basin occurs from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. O₃ concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California. However, the Air Basin still fails to meet the national standards for O₃ and PM_{2.5} and, therefore is considered a federal non-attainment area for these pollutants. In addition, Los Angeles County still fails to meet the national standard for lead and, therefore, is considered a federal non-attainment area for lead.

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 emissions²⁷ sufficiently to meet the upcoming O₃ standard deadlines. 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 O₃ 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 O₃ 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 O₃ standard.^{28,29}

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^{30,31} includes transportation programs, measures, and strategies generally designed to reduce VMT, which are contained in the AQMP.

Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. SCAQMD combines its portion of the AQMP with those prepared by SCAG. The RTP/SCS and Transportation Control Measures (TCMs), included as Appendix IV-C to the 2016 AQMP for the Air Basin, are based on SCAG’s 2016–2040 RTP/SCS. The 2016 AQMP forecasts the 2031 emissions inventories “with growth” based on SCAG’s 2016–2040 RTP/SCS. The region

²⁷ NO_x 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 (page ES-2).

³⁰ SCAG, Final 2016–2040 RTP/SCS, April 2016.

³¹ The 2020–2045 RTP/SCS was approved in September 2020. Consistency with the 2020–2045 RTP/SCS is therefore analyzed in Section IV.F, Land Use, of this Draft EIR. However, the 2016 AQMP relies on the 2016–2040 RTP/SCS.

is projected to see a 12-percent growth in population, 16-percent growth in housing units, 23-percent growth in employment, and 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 local, State and federal levels. The graphic included in Figure IV.B-1 on page IV.B-24 shows the percent change in air quality along with demographic data for the four-county region from the 2016 AQMP. In particular, Figure IV.B-1 illustrates the trends since 1980 of the 8-hour ozone levels. Human activity in the region has an impact on achieving reductions in emissions. However, the ozone and particulate matter levels continue to trend downward as the economy and population increase, demonstrating that it is possible to maintain a healthy economy while improving public health through air quality improvements.³²

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 recent available map to represent existing conditions near the Project area. The estimated cancer risk for the vast majority of the urbanized area within the Air Basin ranges from 200

³² SCAQMD, *Final 2016 AQMP, 2017* (p. 1-6).

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

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

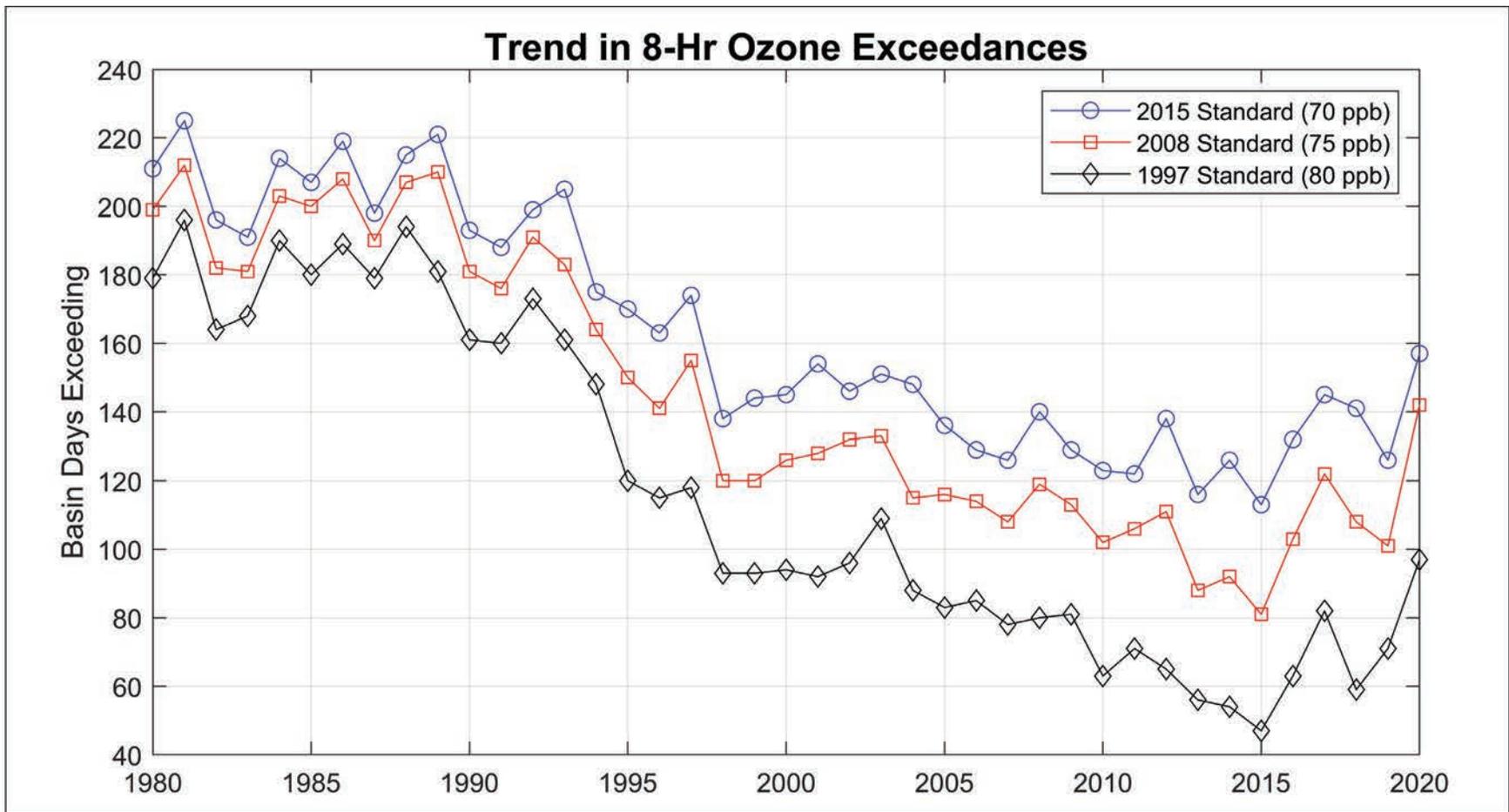


Figure IV.B-1
Ozone Trends

to over 1,200 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.

(a) Existing Pollutant Levels at Nearby Monitoring Stations

SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin and has divided the Air Basin into 38 source receptor areas (SRAs) in which 31 monitoring stations operate. Figure IV.B-2 on page IV.B-26 shows the locations of the SRAs located in Los Angeles County. The Site Locations are located within SRA 1, SRA 2, SRA 3, and SRA 7 which covers the Central Los Angeles area, the Northwest Coastal LA County area, the East San Fernando Valley area, and Southwest Coastal LA County, respectively.

A summary of the monitored values for non-attainment pollutants or precursors O₃, NO₂, and PM_{2.5} at the SRA 1, 2, 3 and 7 monitoring stations for the past three years of available data (2018 to 2020) is presented in Table IV.B-2 through Table IV.B-5 on pages IV.B-27 through IV.B-30. SRA 7 did not have monitoring data available during the 2018–2019 period. Monitoring data from SRA 8 was used to represent conditions in SRA 7 for 2018 and 2019. The values show that the SRA 1, 2, 3, and 7 monitoring stations have registered values above State and/or federal standards for O₃ and PM_{2.5}, while NO₂ concentrations are below State and federal standards.

Table IV.B-2 identifies the national and State ambient air quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured at these stations through the period of 2018–2020.

(b) Existing Health Risk in the Surrounding Area

As shown in Figure IV.B-3 on page IV.B-31, based on the MATES-V model, the calculated cancer risk in the Project area ranges from approximately 329 to 793 in

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

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT



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

Air Quality Reporting

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

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

numbered Monitoring Area and General Forecast Area depicted here.

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

Newspapers, television and radio stations typically will report air

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

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

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

General Forecast Areas & Air Monitoring Areas

Coastal		
Northwest Los Angeles County Coastal	2	
Southwest Los Angeles County Coastal	3	
South Los Angeles County Coastal	4	
North Orange County Coastal	18	
Central Orange County Coastal	20	
Metropolitan		
Central Los Angeles County	1	
Southeast Los Angeles County	5	
South Central Los Angeles County	12	
North Orange County	16	
San Fernando Valley		
West San Fernando Valley	6	
East San Fernando Valley	7	
Santa Clarita Valley	13	
San Gabriel Valley		
West San Gabriel Valley	8	
East San Gabriel Valley	9	
Pomona/Walnut Valley	10	
South San Gabriel Valley	11	
Inland Orange County		
Central Orange County	17	
Saddleback Valley	19	
Capistrano Valley	21	
Riverside Valley		
Corona/Norco Area	22	
Metropolitan Riverside	23	
San Bernardino Valley		
Northwest San Bernardino Valley	32	
Southwest San Bernardino Valley	33	
Central San Bernardino Valley	34	
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		
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.

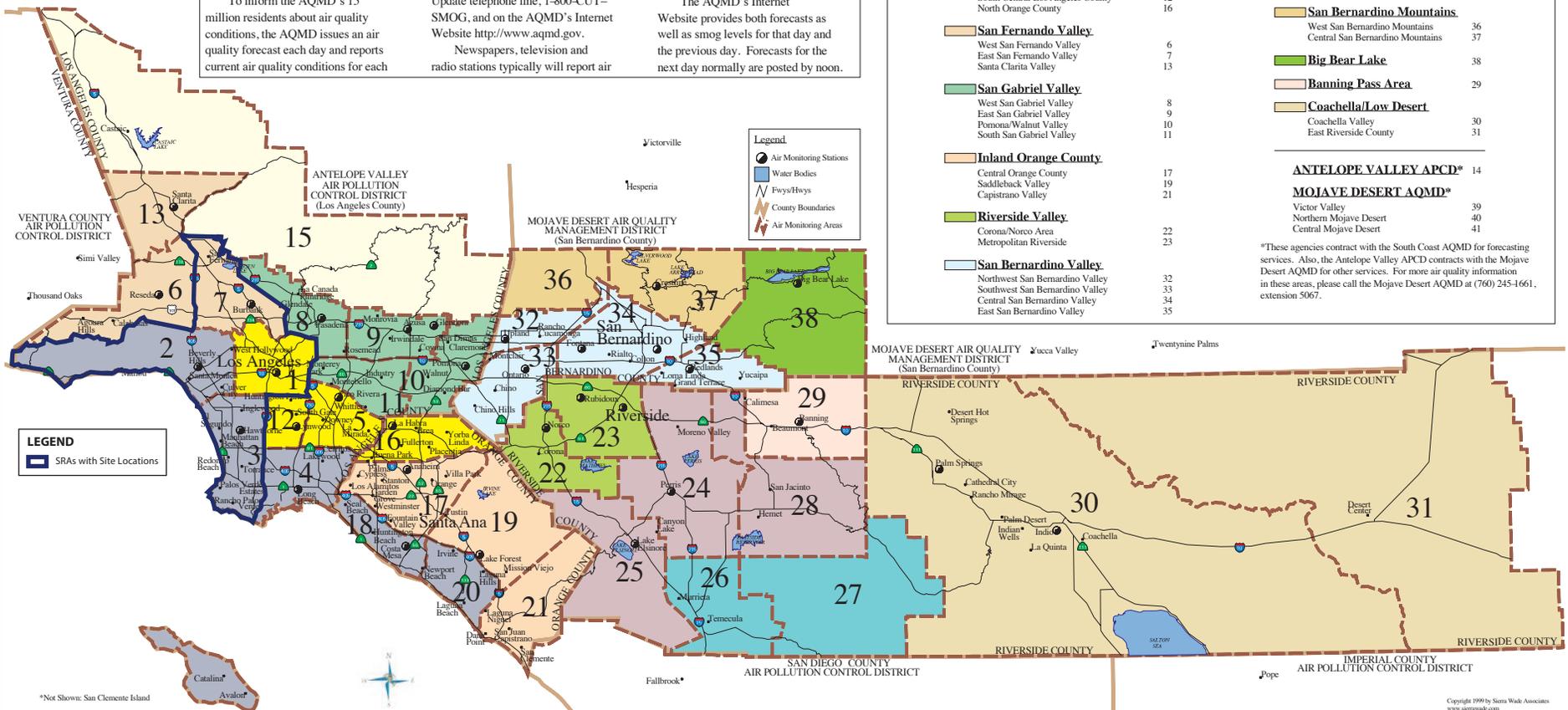


Figure IV.B-2
 SCAQMD SRAs

**Table IV.B-2
Summary of Ambient Air Quality in the Project Vicinity—Source Receptor Area 1**

Pollutant	Year		
	2018	2019	2020
Ozone (O₃)			
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
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 (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
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.07	0.07	0.06
Days exceeding CAAQS (0.18 ppm)	0	0	0
Annual Arithmetic Mean (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
<p>_____</p> <p><i>AAM = annual arithmetic mean</i></p> <p><i>ppm = parts per million by volume</i></p> <p><i>µg/m³ = micrograms per cubic meter</i></p> <p><i>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 June 23, 2022.</i></p>			

**Table IV.B-3
Summary of Ambient Air Quality in the Project Vicinity—Source Receptor Area 2**

Pollutant	Year		
	2018	2019	2020
Ozone (O₃)			
Maximum 1-hour Concentration (ppm)	0.09	0.09	0.13
Days exceeding CAAQS (0.09 ppm)	0	0	6
Maximum 8-hour Concentration (ppm)	0.07	0.08	0.09
Days exceeding NAAQS (0.070 ppm)	2	1	8
Days exceeding CAAQS (0.07 ppm)	2	1	8
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.06	0.05	0.08
Days exceeding CAAQS (0.18 ppm)	0	0	0
Annual Arithmetic Mean (ppm)	0.01	0.01	0.01
Does measured AAM exceed NAAQS (0.0534 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
<hr/> <p>AAM = annual arithmetic mean ppm = parts per million by volume $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter 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 June 23, 2022.</p>			

one million.³⁶ The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., Freeways). Other sources in the vicinity of each proposed TCN Structure include emergency generators, boilers, and char broilers. In general, the risk at each of the TCN Structures is comparable with other urbanized areas in Los Angeles, which is approximately 600 in one million cancer risk.³⁷

The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool (CalEnviroScreen) that can be used to help identify California communities that are disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Site Locations are located within the 73rd to

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

³⁷ SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), Figure ES-6, 2015.*

**Table IV.B-4
Summary of Ambient Air Quality in the Project Vicinity—Source Receptor Area 3**

Pollutant	Year		
	2018	2019	2020
Ozone (O₃)			
Maximum 1-hour Concentration (ppm)	0.07	0.08	0.12
Days exceeding CAAQS (0.09 ppm)	0	0	1
Maximum 8-hour Concentration (ppm)	0.07	0.07	0.07
Days exceeding NAAQS (0.070 ppm)	0	0	2
Days exceeding CAAQS (0.07 ppm)	0	0	2
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.06	0.06	0.06
Days exceeding CAAQS (0.18 ppm)	0	0	0
Annual Arithmetic Mean (ppm)	0.01	0.01	0.01
Does measured AAM exceed NAAQS (0.0534 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
<hr/> <p>AAM = annual arithmetic mean ppm = parts per million by volume µg/m³ = micrograms per cubic meter 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 June 23, 2022.</p>			

100th percentile, which means that the TCN Structures would be located in areas worse than average in terms of pollution in comparison to other communities within California.³⁸

(c) Surrounding Uses

The Site Locations are located on Metro-owned property throughout the City. As shown in Figure II-1, Figure II-2, and Figure II-3 in Section II, Project Description, of this Draft EIR, the TCN Structures would be located adjacent to freeways and major roadways on Metro-owned properties. The majority of the TCN Structures would be located within commercial/industrial areas where there is a mix of uses such as manufacturing, warehouse, retail, studios, storage, and surface parking, although some may be near or adjacent to residential uses.

³⁸ OEHHA, CalEnviroScreen 4.0 MAP, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>, accessed June 23, 2022.

**Table IV.B-5
Summary of Ambient Air Quality in the Project Vicinity—Source Receptor Area 7**

Pollutant	Year		
	2018 ^a	2019 ^a	2020
Ozone (O₃)			
Maximum 1-hour Concentration (ppm)	0.11	0.12	0.13
Days exceeding CAAQS (0.09 ppm)	8	4	31
Maximum 8-hour Concentration (ppm)	0.09	0.10	0.11
Days exceeding NAAQS (0.070 ppm)	19	12	49
Days exceeding CAAQS (0.07 ppm)	19	12	49
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.07	0.06	0.06
Days exceeding CAAQS (0.18 ppm)	0	0	0
Annual Arithmetic Mean (ppm)	0.01	0.01	0.01
Does measured AAM exceed NAAQS (0.0534 ppm)?	No	No	No
Does measured AAM exceed CAAQS (0.03 ppm)?	No	No	No
<p>AAM = annual arithmetic mean ppm = parts per million by volume $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter</p> <p>^a For 2018 and 2019 the monitoring station for SRA 8 was used as no data was available for SRA 7. 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 June 23, 2022.</p>			

(d) Sensitive Uses

Some population groups, including children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to air pollution than others. As shown in Figure II-1, Figure II-2, and Figure II-3 in Section II, Project Description, of this Draft EIR, the TCN Structures are located throughout the City. The majority of the TCN Structures would be located within commercial/industrial areas where there is a mix of uses such as manufacturing, warehouse, retail, storage, and surface parking, although five locations are located within 200 feet of residential and educational uses. Residential and educational receptors are sensitive receptors as these uses would have people residing in the same location for long periods of time or are sensitive to pollution (children). As a worst-case assumption, the analysis assumes that residential or educational uses may be located adjacent to a TCN Structure. SCAQMD's *Localized Significance Threshold Methodology for CEQA Evaluations* provides look-up tables based on distance to receptor and acreage of the Project Site to assist lead agencies in evaluating air quality impacts. SCAQMD's localized significance thresholds (LSTs) provides receptor distances of 25, 50, 100, 200, and 500 meters. This analysis

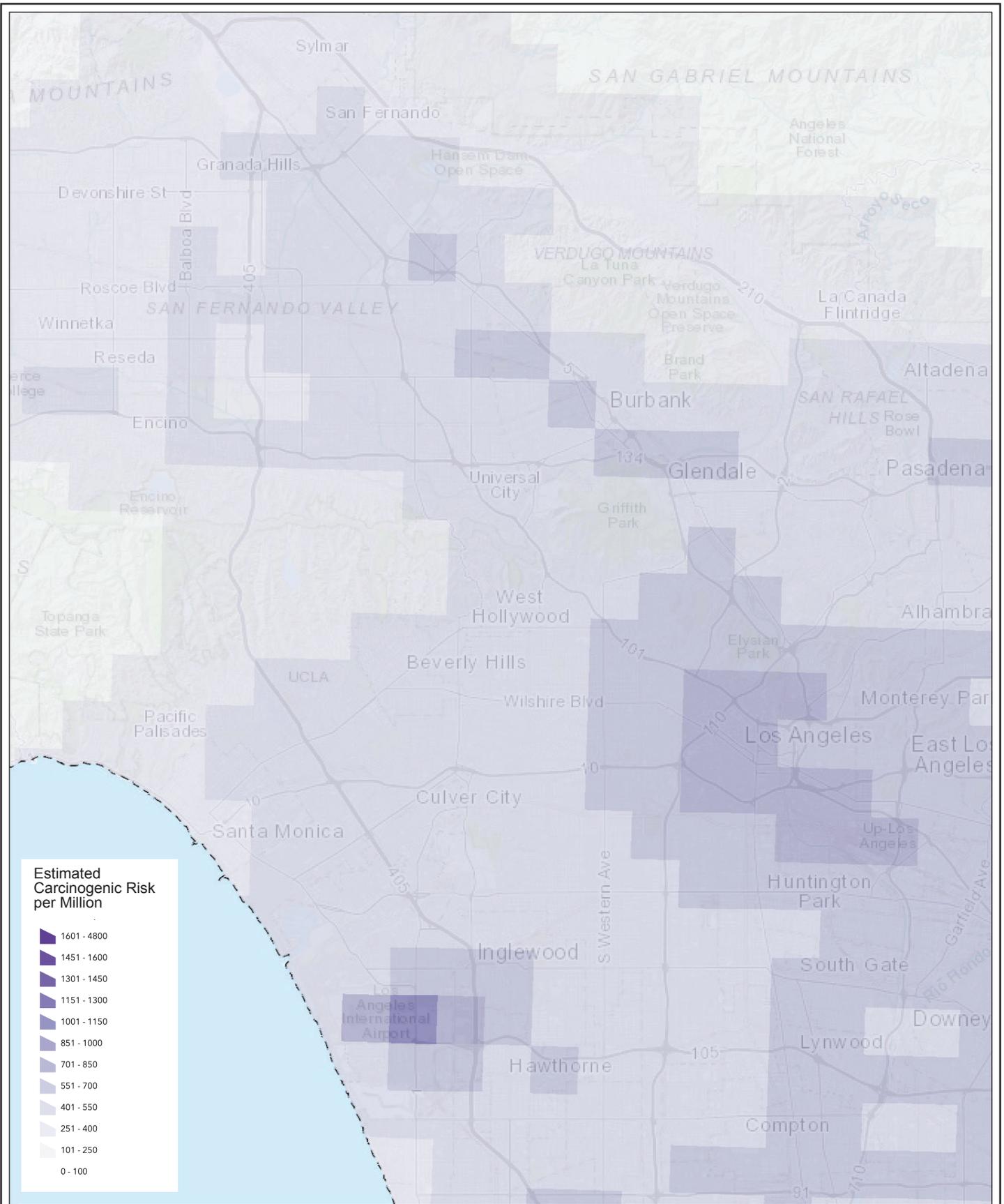


Figure IV.B-3
MATES V Total Cancer Risk for Project Area

Source: South Coast AQMD, 2021.

conservatively used the 25-meter receptor distance. All other existing air quality-sensitive uses are located at greater distances from the Site Locations and would experience lower air pollutant impacts from potential sources of pollutants from the Site Locations due to atmospheric dispersion effects.

(e) *Existing Project Site Emissions*

The Site Locations are mostly located on vacant land owned by Metro with limited vegetation. The existing static displays to be removed are also located on Metro owned land and are generally inaccessible to the public. Mobile source emissions are generated by limited motor vehicle trips to and from the existing static displays for maintenance and sign change out. Area source emissions are generated by the use of maintenance equipment, landscape equipment, and products that contain solvents. Table IV.B-6 below presents an estimate of the existing emissions for a static display.

Table IV.B-6
Estimated Daily Regional Operational Criteria Pollutant Emissions for a Static Display—Baseline^a

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	<1	<1	<1	<1	<1	<1
Mobile	<1	<1	<1	<1	<1	<1
Off Road Equipment	<1	1	<1	<1	<1	<1
Total Existing Emissions^a	<1	1.5	<1	<1	<1	<1

Numbers may not add up exactly due to rounding.

^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C.2 (CalEEMod Output) of this Draft EIR.

Source: Eyestone Environmental, 2022.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with Appendix G of the State 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 SCAQMD's CEQA Air Quality Handbook includes factors that may assist in answering the Appendix G Threshold questions.

(2) SCAQMD's CEQA Air Quality Handbook

To assist in answering the Appendix G Threshold questions and factors identified in Appendix G for purposes of this analysis, Metro utilizes the thresholds of significance in SCAQMD's *CEQA Air Quality Handbook, Chapter 6*, as identified below, to assess the significance of the Project's estimated air quality impacts. Specifically, Table IV.B-7 on page IV.B-34 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*,³⁹ the Project would have a significant impact with regard to construction emissions if any of the following would occur:

- Emissions from both direct and indirect sources would exceed any of the SCAQMD prescribed threshold levels identified in Table IV.B-7.
- Maximum on-site daily localized emissions exceed the Localized Significance Thresholds (LST), resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m³] over a 1-hour period or 9.0 ppm [10,350 µg/m³] averaged over an 8-hour period) and NO₂ (0.18 ppm [338.4 µg/m³] over a 1-hour period, 0.1 ppm [188 µg/m³] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [56.4 µg/m³] averaged over an annual period).

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

**Table IV.B-7
SCAQMD Air Quality Significance Thresholds**

Mass Daily Thresholds^a		
Pollutant	Construction^b	Operation
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 \geq 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas \geq 1 in 1 million) Chronic & Acute Hazard Index \geq 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants^c		
NO₂ 1-hour average Annual Arithmetic Mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (State) 0.03 ppm (State) and 0.0534 ppm (federal)	
PM₁₀ 24-hour average Annual Average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^d & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM_{2.5} 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
SO₂ 1-hour average 24-hour average	0.25 ppm (State) & 0.075 ppm (federal—99th percentile) 0.04 ppm (State)	
Sulfate 24-hour average	25 $\mu\text{g}/\text{m}^3$ (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^e 30-day average Rolling 3-month average	1.5 $\mu\text{g}/\text{m}^3$ (State) 0.15 $\mu\text{g}/\text{m}^3$ (federal)	
<p><i>lbs/day = pounds per day</i></p> <p>^a SCAQMD CEQA Handbook (SCAQMD, 1993), Pages 6-2 and 6-3.</p> <p>^b Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).</p> <p>^c Ambient air quality thresholds for criteria pollutants are based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.</p>		

Table IV.B-7 (Continued)
SCAQMD Air Quality Significance Thresholds

^d Ambient air quality threshold is based on SCAQMD Rule 403.

^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: South Coast Air Quality Management District, 2019.

- Maximum on-site localized PM₁₀ or PM_{2.5} emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed the incremental 24-hr threshold of 10.4 µg/m³ or 1.0 µg/m³ PM₁₀ averaged over an annual period.

(b) Operation

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

- Emissions from both direct and indirect sources exceed any of the SCAQMD prescribed threshold levels identified in Table IV.B-7 on page IV.B-34.
- Maximum on-site daily localized emissions exceed the LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 parts per million (ppm) over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO₂ (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).⁴¹
- Maximum on-site localized operational PM₁₀ and PM_{2.5} emissions exceed the incremental 24-hr threshold of 2.5 µg/m³ or 1.0 µg/m³ PM₁₀ averaged over an annual period.⁴²
- 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

⁴⁰ SCAQMD, *CEQA Air Quality Handbook*, 1993.

⁴¹ SCAQMD, *LST Methodology*.

⁴² SCAQMD, *Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM_{2.5} Significance Thresholds*, October 2006.

- 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:⁴³

- The Project emits carcinogenic or TACs that exceed the maximum incremental cancer risk as provided in Table IV.B-7 on page IV.B-34.

In assessing impacts related to TACs in this section, the City has used Appendix G as the thresholds of significance. 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 project impacts under 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 1.0.⁴⁴ For projects with a maximum incremental cancer risk between 1 in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

(d) *Consistency with Applicable Air Quality Plans*

Section 15125 of the State CEQA Guidelines requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's *CEQA Air Quality Handbook*,⁴⁵ the following criteria were used to evaluate the Project's consistency with the SCAQMD and SCAG regional plans and policies, including the AQMP:

- Criterion 1: Will the Project result in any of the following:
 - An increase in the frequency or severity of existing air quality violations;

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

⁴⁴ *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.*

⁴⁵ SCAQMD, *CEQA Air Quality Handbook*, Chapter 12, *Assessing Consistency with Applicable Regional Plans*, 1993.

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

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

(e) Cumulative Impacts

Based on SCAQMD guidance, individual construction projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.⁴⁶ 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.⁴⁷

The cumulative analysis of air quality impacts within this Draft EIR follows SCAQMD's guidance such that construction or operational Project emissions will be

⁴⁶ Wong, Jillian, SCAQMD CEQA Specialist, personal communication, August 8, 2016.

⁴⁷ South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, August 2003.

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 extensively in the preparation of this analysis. SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*.⁴⁸

Supplemental guidance/information to assist lead agencies is provided on the SCAQMD website (www.aqmd.gov/ceqa/hdbk.html) 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. 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.

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.⁴⁹ 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 risk. 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 pollutant emissions would result from both construction

⁴⁸ SCAQMD, *Air Quality Analysis Handbook*, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed June 27, 2022.

⁴⁹ SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005.

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 cranes, mobile bucket lifts, and through vehicle trips generated from workers and haul and delivery trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and various site clearing 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 as well as variable activity and weather conditions.

The static displays would be removed concurrently with construction of the TCN structures over a period of two years. Overall, the removal of existing static displays and construction of the TCN Structures is anticipated to commence in 2023 and be completed in 2025. Static displays would be removed and new TCN structures would be constructed intermittently over the two year period. It is possible that static display removal and TCN structure construction activities could be occurring on the same day, although at different sites.

As a conservative approach, the analysis assumes that up to four (4) static display removal crews and four (4) TCN structure construction crews could be operating simultaneously on a worst-case day. It was also assumed that each static display removal crew would be able to take down two existing static displays per day. Removal of existing static displays would take approximately half a day at each location and would consist of removing the static displays with a mobile crane or a bucket truck.

The TCN Structures would be constructed with the use of a drill rig that would drill a hole up to 50 feet in depth on an approximately 10-foot by 10-foot area, depending on soil conditions and size of the digital display. A steel column for the digital display would be placed with a crane and cast in place with concrete. The digital display face(s) would then be assembled at grade and would be lifted by a mobile crane and affixed to the column structure. Further, minor trenching would be required to lay electrical conduit. It is assumed that up to four TCN Structures would be constructed or installed simultaneously (worst-case day). Project construction is anticipated to commence in 2023 and be completed in 2025 constructing a total 56 digital displays, approximately 55,000 square feet. It is assumed that four static display removal crews each taking down two displays per day and four digital displays can be undergoing construction on a single day. Detailed

equipment lists, construction scheduling, and emissions calculations are provided in Appendix C.2 of this Draft EIR.

(a) Regional Emissions

The Project's "regional" emissions refer to emissions that were evaluated based on regional significance thresholds established by SCAQMD, as discussed above. Daily regional emissions during construction are estimated by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying mobile source and fugitive dust emissions factors. The emissions are estimated using CalEEMod (Version 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 Los Angeles area and within the State for quantifying the emissions associated with development projects undergoing environmental review, including by Metro.

CalEEMod is based on outputs from Off-Road Emissions Inventory Program model⁵⁰ (OFFROAD) and EMFAC,⁵¹ which are emissions estimation models developed by CARB, and used to calculate emissions from construction activities, including off- and on-road vehicles, respectively. CalEEMod also relies upon known emissions data associated with certain activities or equipment (often referred to as "default" data, values or factors) that can be used if site-specific information is not available. CalEEMod contains default values to use in each specific local air district region. Default values within CalEEMod were obtained from a survey of construction sites conducted by SCAQMD. The construction survey data was used to determine appropriate construction equipment based on lot size and project type.⁵² Appropriate statewide default values can be used, if regional default values are not defined.

The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate criteria pollutant emissions values for each construction activity. Construction tasks were

⁵⁰ CARB, *MSEI, Documentation, Off-Road, Diesel Equipment*, ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road, accessed June 27, 2022.

⁵¹ CARB, *EMFAC 2017*.

⁵² CAPCOA, *California Emissions Estimator Model, Appendix E1: Construction Survey and SCAQMD, October 2017*.

aggregated to identify the reasonably expected maximum construction emissions occurring over the course of Project construction.

(b) Localized Emissions

The localized effects from the on-site portion of daily construction emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's LST methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling, where appropriate, to assess whether the Project's local emissions would exceed SCAQMD's significance thresholds, as described above.⁵³ SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x; CO; PM₁₀; and PM_{2.5}.⁵⁴ SCAQMD does not provide LSTs for SO₂, Pb, and H₂S since 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 O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and 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 that are less than or equal to 5 acres. If the 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

Analysis of the Project's impact on regional air quality during long-term Project operations (i.e., after construction is complete) takes into consideration four types of sources: (1) area; (2) energy; (3) mobile; and (4) stationary. Area source emissions are generated by, among other things, landscape equipment and the use of consumer

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

⁵⁴ SCAQMD, *LST Methodology*, p. 1-4, October 2009.

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). In general, 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. The TCN Structures are not expected to consume natural gas and would not have emergency generators. Therefore, natural gas and stationary emissions are expected to be zero.

Criteria pollutants are also emitted during the generation of electricity at fossil fuel power plants. When electricity is used in buildings and structures, the electricity generation typically takes place at offsite power plants, the majority of which burn fossil fuels. Because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, State, and federal control measures, which can be considered to be the maximum feasible level of mitigation for stack emissions. CalEEMod, therefore, does not calculate criteria pollutant emissions from regional power plants associated with 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. During operations, the TCN Structures would not generate routine vehicle trips. However, it was conservatively assumed that two (2) vehicle roundtrips would be required per day for maintenance activities to cover all 56 TCN Structures. Trip distances for maintenance vehicle trips were based on CalEEMod default values. CalEEMod then converts EMFAC emission rates into CalEEMod vehicle emission factors.⁵⁵ Area source emissions are based on landscaping equipment, and consumer product usage (including paints) rates provided in CalEEMod. As discussed above, the TCN Structures would not consume natural gas or have emergency generators.

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.⁵⁶ To be conservative, this analysis evaluates the Project's air quality impacts during operations based on reasonably expected maximum operational

⁵⁵ CAPCOA, *California Emissions Estimator Model, Appendix A: Calculation Details for CalEEMod*, November 2017.

⁵⁶ SCAQMD, *SCAQMD Air Quality Significance Thresholds*, revised April 2019. 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.)

emissions even though such emissions would not occur throughout the entire operational phase. Refer to Appendix C.1 of this Draft EIR for additional information regarding methodology.

(b) Localized Emissions

(i) On-Site Emissions

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

(ii) Off-Site Emissions

Potential localized CO concentrations from induced traffic at nearby intersections are addressed consistent with the methodologies and assumptions used in the consistency analysis provided in the 2003 AQMP.⁵⁷

However, as discussed above, during operation of the TCN Structures, vehicle trips would be minimal and limited to occasional maintenance vehicles. Therefore, it is unlikely that operational vehicle trips would result in exceedance of CO ambient air quality standards at nearby intersections.

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

Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with SCAQMD guidance and the CARB Handbook. 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 following project design feature is proposed with respect to air quality:

⁵⁷ *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.*

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 would comply with the Metro Green Construction Policy and is committed to using more sustainable construction equipment and vehicles as well as implementing best practices, to reduce harmful diesel emissions from all Metro construction projects performed on Metro properties and in Metro ROWs. From January 2015 onwards, the Green Construction Policy has required that all off-road, diesel-powered construction equipment greater than 50 horsepower shall meet Tier 4 off-road emission standards at a minimum.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) SCAQMD CEQA Air Quality Handbook Policy Analysis

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

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

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

(i) *Criterion 1*

With respect to the first criterion, as discussed below, localized concentrations of NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} have been analyzed for the Project.⁵⁸ Due to California Low Sulfur Diesel Fuel requirements, calculations shown below demonstrate that SO₂ emissions would be negligible during construction and long-term operations and, therefore, would not have the potential to cause or contribute to a violation of the SO₂ ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

The Project's maximum potential NO_x, CO, PM₁₀, 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 contribute to a violation of an applicable ambient air quality standard. As shown in Table IV.B-12 on page IV.B-59 in the analysis below, localized NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} would not exceed the SCAQMD-recommended localized significance thresholds. **Therefore, Project construction would not result in a significant impact with regard to localized air quality.**

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 motor vehicle activity during Project construction and operations.⁵⁹ As discussed below, no intersections would require a CO hotspot analysis, and impacts would be less than significant. **Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.**

An analysis of potential localized operational impacts from on-site activities was also conducted. As shown in Table IV.B-12 in the analysis below, localized NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} operational impacts would be less than significant. **Therefore, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.**

⁵⁸ SCAQMD LST mass-rate lookup thresholds are presented in terms of NO_x. However, these thresholds were derived based on the State and federal NO₂ ambient air quality standards. Although Project localized emissions presented in this analysis are in the form of NO_x, localized impacts are evaluated in terms of NO₂ based on SCAQMD LST methodology.

⁵⁹ SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, 1993.

(ii) Criterion 2

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 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.

- 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 has recently been adopted and is anticipated to form the basis of the next AQMP.

As described in Section IV.J, Land Use and Planning, of this Draft EIR, the City's General Plan serves as a comprehensive, long-term plan for future development of the City. The 2016–2040 and 2020–2045 RTP/SCS provide socioeconomic forecast projections of regional population and employment growth. The population and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.

The Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed and are not typically brought from other regions to work on developments, such as the Project. Moreover, these jobs would be relatively small in number and temporary in nature. Also discussed in the Initial Study included as Appendix A of this Draft EIR, the Project does not propose development of residential uses that would generate residential population growth or other uses that would generate new permanent employees. Therefore, the Project would be consistent with the long-term employment, and population projections upon which the 2016 AQMP is based.

- Does the project implement feasible air quality mitigation measures?

The Project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) as required by SCAQMD, as summarized above. In addition, the Metro Green Construction Policy would require pollutant emissions reduction measures such as use of EPA Tier 4 construction equipment and use of grid-based electricity where feasible. Furthermore, with compliance with the regulatory requirements identified above and in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR, no significant air quality impacts would occur. **As such, the Project is consistent with this AQMP consistency criterion.**

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

The AQMP relies on the RTP/SCS to establish Transportation Control Measures. Other control measures in the AQMP apply to stationary sources, and therefore are not relevant to the Project. The Project would not generate trips on a regular basis. However, to provide for a conservative analysis, approximately two (2) vehicles (roundtrips) would be required per day for maintenance activities to cover all 56 TCN Structures. In addition, the existing static displays also generate vehicle trips for maintenance and change out activities at a similar trip generation rate. As the total number of static displays would be reduced by approximately 200 existing static displays (or conservatively 100 structures)⁶⁰ to up to 56 TCN Structures, this would result in a reduction in VMT.

The TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passengers experience by helping to facilitate transit signal priority, bus wi-fi, and efficiently relay bus arrival time information to riders. This would increase alternative modes of transportation and reduce emissions from single occupant vehicles.

Therefore, the Project would be consistent with the goals of the 2016–2040 RTP/SCS.⁶¹ **Accordingly, the Project would support 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 would not have a significant long-term impact on the region's ability to meet State and federal air

⁶⁰ *The approximately 200 existing static displays to be removed are located on Metro property within the City of Los Angeles. The existing static displays consist of structures with one or two static displays per structure. For a conservative analysis, it is assumed that every structure contains two static displays.*

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 Air Quality Element of the City's General Plan, performance-based standards have been adopted to provide flexibility in implementation of its policies and objectives. The following Air Quality Element goals, objectives, and policies are relevant to the Project:

Goal 1—Good air quality and mobility in an environment of continued population growth and health economic structure.

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.

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.

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.

Policy 2.1.1—Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.

Goal 4—Minimize 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.

Objective 4.1—It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.

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.

Objective 4.2—It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.

Policy 4.2.2—Improve accessibility for the City’s residents to places of employment, shopping centers, and other establishments.

Policy 4.2.3—Ensure that new development is 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.

Policy 4.2.5—Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.

As discussed above, operation of the Project would not generate VMT on a daily basis. Any vehicle trips and associated VMT resulting from maintenance activities would be limited to 2 vehicle roundtrips per day. A more detailed analysis of the Project’s consistency with the City’s General Plan is presented in Table IV.B-8 on page IV.B-50, which identifies specific goals and policies of the City’s General Plan and demonstrates the Project’s consistency with these goals.

In conclusion, analysis of Threshold (a) was based on the Project’s consistency with the AQMP, as well as the City of Los Angeles’ Air Quality Element goals, objectives, and policies that are relevant to the Project. The determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. As discussed above, the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants.

As the Project would not exceed any of the State and federal air quality standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project would not conflict with growth projections that form the basis of the 2016 AQMP, the Project would be consistent with the emissions forecasts in the AQMP. Furthermore, compliance with the regulatory requirements identified above and in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR, no significant air quality impacts would occur, and, as such, no air quality mitigation measures are necessary for the Project to meet this AQMP consistency criterion. Additionally, as the Project would not conflict with the City’s and SCAQMD’s objectives of

**Table IV.B-8
Project Consistency with City of Los Angeles General Plan (Air Quality Element)**

Recommendation	Analysis of Project Consistency
Air Quality Element	
<p>Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.</p>	<p>Consistent. The operation of the Project would not generate VMT on a daily basis. Any vehicle trips and associated VMT resulting from maintenance activities would be infrequent. The TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passengers experience by helping to facilitate transit signal priority, bus wi-fi, and efficiently relay bus arrival time information to riders. Therefore, the Project would be consistent with Goal 1 of the City's General Plan Air Quality Element</p>
<p>Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.</p>	<p>Consistent. The Project would serve to collect and disseminate information to the public travelling along freeways to improve roadway efficiency and public safety. The TCN Structures would also include live video and security feeds to supplement Caltrans' existing cameras on the freeway and street corridors to assist with traffic routing and signal timing. While the Project would not directly reduce VMT, features to improve traffic flow would increase traffic mobility while also sustaining economic growth.</p> <p>The TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passengers experience by helping to facilitate transit signal priority, bus wi-fi, and efficiently relay bus arrival time information to riders. This would increase alternative modes of transportation and reduce emissions from single occupant vehicles. Therefore, the Project would be consistent with Objective 1.1 of the City's General Plan Air Quality Element.</p>
<p>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.</p>	<p>Consistent. 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 the CARB In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of DPM filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. In addition, the Project would not have large areas of unpaved surfaces.</p> <p>The Project would reduce PM₁₀ and PM_{2.5} emissions from unpaved areas and during construction by complying with SCAQMD Rule 403. Therefore, the Project would be consistent with Objective 1.3 of the</p>

Table IV.B-8 (Continued)
Project Consistency with City of Los Angeles General Plan (Air Quality Element)

Recommendation	Analysis of Project Consistency
	City's General Plan Air Quality Element.
<p>Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.</p>	<p>Consistent. The operation of the Project would not generate VMT on a daily basis. Any vehicle trips and associated VMT resulting from maintenance activities would be infrequent and less than existing conditions.</p> <p>The TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passengers experience by helping to facilitate transit signal priority, bus wi-fi, and efficiently relay bus arrival time information to riders. This would increase alternative modes of transportation and reduce emissions from single occupant vehicles. Therefore, the Project would be consistent with Goal 2 of the City's General Plan Air Quality Element.</p>
<p>Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.</p>	<p>Consistent. The operation of the Project would not generate VMT on a daily basis. Any vehicle trips and associated VMT resulting from maintenance activities would be infrequent and less than existing conditions. The TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passengers experience by helping to facilitate transit signal priority, bus wi-fi, and efficiently relay bus arrival time information to riders. Therefore, the Project would be consistent with Objective 2.1 of the City's General Plan Air Quality Element.</p>
<p>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.</p>	<p>Consistent. The Project analysis of potential air quality impacts relied upon the numeric indicators established by SCAQMD, which considers attainment of the ambient air quality standards. Air quality impacts would be less than significant and would not cause or contribute to an exceedance of the ambient air quality standards. Therefore, the Project would be consistent with Objective 4.1 of the City's General Plan Air Quality Element.</p>
<p>Objective 4.2: It is the objective of the City of Los Angeles to reduce vehicle trips and VMT associated with land use patterns.</p>	<p>Consistent. The Project would serve to collect and disseminate information to the public travelling along freeways to improve roadway efficiency and public safety. The TCN Structures would also include live video and security feeds to supplement Caltrans' existing cameras on the freeway and street corridors to assist with traffic routing and signal timing. The Project would reduce VMT related to the maintenance of the existing static displays, as well as by, providing information to drivers would help to improve traffic flow and reduce vehicle delay time. Therefore, the Project</p>

Table IV.B-8 (Continued)
Project Consistency with City of Los Angeles General Plan (Air Quality Element)

Recommendation	Analysis of Project Consistency
	would be consistent with Objective 4.2 of the City's General Plan Air Quality Element.
<p>Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.</p>	<p>Consistent The TCN Program would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would aim to improve bus passengers experience by helping to facilitate transit signal priority, bus wi-fi, and efficiently relay bus arrival time information to riders. In addition, the TCN Structures would incorporate real time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services. Therefore, the Project would be consistent with Policy 4.2.2 of the City's General Plan Air Quality Element.</p>
<p>Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.</p>	<p>Not Applicable. The Project would not include any residential or commercial uses that would involve pedestrians, bicycles, transit or alternative fuel vehicles.</p>
<p>Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.</p>	<p>Consistent. The environmental review conducted for the Project includes an analysis of air quality impacts; the decision-maker(s) for the discretionary actions would be responsible for determining that the environmental review was conducted in compliance with CEQA. Therefore, the Project would be consistent with Policy 4.2.4 of the City's General Plan Air Quality Element.</p>
<p>Policy 4.2.5: Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.</p>	<p>Consistent. The Project would serve to collect and disseminate information to the public travelling along freeways to improve roadway efficiency and public safety. The TCN Structures would also include live video and security feeds to supplement Caltrans' existing cameras on the freeway and street corridors to assist with traffic routing and signal timing. Further, the Project would reduce VMT related to the maintenance of the existing static displays, as well as by, providing information to drivers would help to improve traffic flow and reduce vehicle delay. Therefore, the Project would be consistent with Policy 4.2.5 of the City's General Plan Air Quality Element.</p>
<p>Source: <i>Eyestone Environmental, 2022.</i></p>	

reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project impacts related to Threshold (a) during both construction and operation of the Project would be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Regional Emissions

(i) Construction

Removal of the existing static displays would occur concurrently with the installation of the TCN Structures. Overall, the removal of existing static displays and construction of the TCN Structures is anticipated to commence in 2023 and be completed in 2025. Construction of each TCN Structure would begin with excavation for the steel columns supporting the TCN Structures. Digital display foundations would then excavated, followed by construction, and paving/concrete installation. The Project would install new utility connections from existing public infrastructure to serve the TCN Structures. A maximum of 93 cubic yards of export would be hauled from each TCN Structure location for a total maximum of approximately 5,208 cubic yards of export for all Site Locations. As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays. Signage to be removed would include at minimum approximately 200 static displays located within the City. It was assumed that a maximum of four static display removal crews would be operating with each crew able to remove 2 static displays per day and four TCN Structures would be constructed at one time (worst-case day).

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

The emissions levels in Table IV.B-9 on page IV.B-55 represent the highest daily emissions projected to occur during each year of construction. As presented in Table IV.B-9 construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) would not exceed the SCAQMD daily significance thresholds for VOC, CO, SO_x, PM₁₀, or PM_{2.5}. **Therefore, regional construction emissions resulting from the Project would result in a less than significant impact.**

(ii) Operation

As discussed above, SCAQMD's CalEEMod was used to calculate regional area, energy, mobile source, and stationary emissions.

Table IV.B-10 on page IV.B-56 provides Project operational emissions. As shown in Table IV.B-10, regional emissions resulting from operation of the Project would not exceed any SCAQMD's daily regional operational thresholds. **Therefore, regional operational emissions resulting from the Project would result in a less than significant air quality impact.**

(b) Localized Emissions

As previously discussed, SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of a 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. The TCN Structures would be located throughout the City on Metro owned property. It was assumed that up to four static display removal crews would be operating and four TCN Structures would be constructed simultaneously. It was also assumed that each static display removal crew would be able to take down two existing static displays per day. Although the TCN Structures would be spread out over a large area, the localized analysis conservatively assumes that up to eight static displays would be removed and four TCN Structures would be constructed or removed within a one-acre area.

Table IV.B-9
Estimate of Maximum Regional Project Daily Construction Emissions (pounds per day)

Construction Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Regional Construction Emissions						
2023	4	37	116	<1	3	1
2024	4	37	116	<1	3	1
2025	4	40	116	<1	5	2
Maximum Unmitigated Construction Emissions^{a,b}	4	40	116	<1	5	2
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(71)	(60)	(477)	(150)	(145)	(53)
Maximum Unmitigated Construction Emissions Exceed Threshold?	No	No	No	No	No	No
<p>Numbers may not add up exactly due to rounding.</p> <p>^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C.2 (CalEEMod Output) of this Draft EIR.</p> <p>^b Construction emissions take into account the Metro Green Construction Policy which requires construction equipment greater than 50 horsepower to meet EPA Tier 4 emissions standards.</p> <p>Source: Eyestone Environmental, 2022.</p>						

(i) Construction

As analyzed in Threshold (c) below and provided in Table IV.B-11 on page IV.B-57, maximum construction emissions would not exceed the SCAQMD recommended localized screening thresholds for NO_x, CO, PM₁₀, or PM_{2.5}. **Therefore, localized construction emissions resulting from the Project would result in a less than significant impact.**

(ii) Operations

Project-related operational emissions were also evaluated based on SCAQMD LST methodology. The SCAQMD LST methodology evaluates emissions from on-site sources (e.g., water heaters, HVAC). As analyzed in Threshold (c) below, Project-related operational emissions from on-site sources would not exceed localized thresholds. **Therefore, localized operational emissions resulting from the Project would result in a less than significant air quality impact.**

(2) Mitigation Measures

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

Table IV.B-10
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout for All 56
Proposed TCN Structures^a

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Project						
Area	<1	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	<1	<1	<1	<1	<1	<1
Off-Road Equipment	<1	<1	<1	<1	<1	<1
Total Proposed Uses Emissions	<1	<1	<1	<1	<1	<1
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(55)	(55)	(550)	(150)	(150)	(55)
Exceed Threshold?	No	No	No	No	No	No
<p>Numbers may not add up exactly due to rounding.</p> <p>^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C.2 (CalEEMod Output) of this Draft EIR. The table reflects net emissions (i.e., Project emissions less existing emissions).</p> <p>Source: Eyestone Environmental, 2022.</p>						

(3) Level of Significance After Mitigation

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

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

(1) Impact Analysis

(a) Construction

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

The localized construction air quality analysis was conducted using the methodology promulgated by SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.⁶² LSTs represent

⁶² SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

Table IV.B-11
Estimate of Maximum Localized Daily Project Construction Emissions (pounds per day)

Construction Year	NO _x	CO	PM ₁₀	PM _{2.5}
2023	27	113	<1	<1
2024	26	112	<1	<1
2025	26	112	<1	<1
Maximum Unmitigated Daily Localized Emissions^b	27	113	<1	<1
SCAQMD Localized Significance Thresholds^{a c}	59	714	5	3
Over/(Under)	(32)	(601)	(4)	(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 Construction emissions take into account the Metro Green Construction Policy which requires construction equipment greater than 50 horsepower to meet EPA Tier 4 emissions standards.

^c The SCAQMD Daily Significance Thresholds are based on a 1-acre Project Site. The closest sensitive land uses are assumed to be adjacent to the Site Locations to provide a conservative analysis. The localized threshold is conservatively based on a 25 meter receptor distance which is the closest receptor distance on the SCAQMD mass rate LST look-up table. While the TCN Structures would be built in multiple SRAs, LST thresholds for SRA 1 were used as these thresholds are the most conservative.

Source: Eyestone Environmental, 2022.

the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2018–2020) for the Project area presented in Table IV.B-2 on page IV.B-27. Although the trend shown in Table IV.B-2 demonstrates that ambient air quality is improving in the area, the localized construction emissions analysis conservatively did not apply a reduction in background pollutant concentrations for subsequent years of construction (i.e., 2023–2025). By doing so, the allowable pollutant increment to not exceed an ambient air quality standard is more stringent. The analysis is based on existing background ambient air quality monitoring data (2018–2020).

Maximum on-site daily construction emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and compared to the applicable SCAQMD LSTs based on a construction site acreage of one acre. As discussed above, the TCN Structures would be constructed throughout the City which may be located in several different SRAs. As LST mass-rate lookup thresholds are specific to each SRA, the most stringent LST threshold throughout the Project area was used for the localized analysis. As a conservative approach, LST thresholds for SRA 1 (Downtown LA) was utilized as these would be the most stringent in comparison to SRA 2, SRA 3, and SRA 7.

Potential impacts were evaluated at the closest off-site sensitive receptors, assumed to be adjacent to the Site Locations. This analysis conservatively used the closest receptor distance provided by SCAQMD (25 meters). All other existing air quality-sensitive uses are located at greater distances from the Project Site and would experience lower air pollutant impacts from potential sources of pollutants from the Project Site due to atmospheric dispersion effects. The maximum daily localized emissions from Project construction and LSTs are presented in Table IV.B-11 on page IV.B-57. As shown in Table IV.B-11, maximum construction emissions would not exceed the SCAQMD recommended localized screening thresholds for NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. **Therefore, localized construction emissions resulting from the Project would result in a less than significant impact.**

(ii) On-Site Construction Activities (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, 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 would contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule from 2023 to 2025, as well as limited construction duration of up to four weeks for installation per location, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment (HRA) for short-term construction emissions. It is, therefore, not necessary to evaluate long-term cancer impacts from construction activities, which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. **As such, Project-related TAC impacts during construction would be less than significant.**

(b) Operation

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

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table IV.B-12 on page IV.B-59. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to 5 acres in size, were used to evaluate potential localized impacts. As shown in Table IV.B-12, on-site operational emissions would not exceed any of the LSTs. **Therefore, localized on-site operational emissions resulting from the Project would result in a less than significant air quality impact.**

Table IV.B-12
Estimate of Maximum Localized Project Daily Operational Emissions—At Project Buildout (2025)
(pounds per day)^a

Emission Source	NO_x	CO	PM₁₀	PM_{2.5}
Area	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1
Stationary	<1	<1	<1	<1
On-Site Total	<1	<1	<1	<1
SCAQMD Significance Threshold^b	59	714	2	1
Over/(Under)	(58)	(713)	(2)	(1)
Exceed Threshold?	No	No	No	No

Numbers may not add up exactly due to rounding.

^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C.2 (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 based on a one-acre Project Site. The closest sensitive receptors are residential uses southwest 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, 2022.

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

As discussed above, the Project would not generate trips and VMT on a regular basis during operations. Trips would be limited to two vehicles (roundtrips) per day for maintenance activities to cover all 56 TCN Structures. 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 are included in Appendix C.2 of this Draft EIR.

(iii) Toxic Air Contaminants

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has 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 air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).⁶³ SCAQMD adopted similar recommendations in its *Guidance Document for*

⁶³ CARB, *Air Quality and Land Use Handbook, a Community Health Perspective*, April 2005.

*Addressing Air Quality Issues in General Plans and Local Planning.*⁶⁴ Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations include light painting activities and emissions from diesel power equipment for maintenance purposes. However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that SCAQMD recommends that HRAs be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.⁶⁵ The Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Site Locations 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 TAC 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. The Project's potential use of hazardous materials is addressed in the Initial Study for the Project, included as Appendix A to this Draft EIR. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for maintenance activities for TCN Structures. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials including cleaning products. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning products, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program (CalARP). In addition, these products would be used, stored and disposed of in accordance with manufactures instructions and applicable regulations. As such, the Project would not release substantial amounts of TACs, and impacts on human health would be less than significant.

⁶⁴ SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 6, 2005.

⁶⁵ SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, 2002.

As the Project would not involve substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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

e. Cumulative Impacts

(1) Impact Analysis

As discussed above under Thresholds (b) and (c) above, the Project's construction and operational-related regional air quality emissions, localized emissions, and emissions of TACs would be less than significant and mitigation would not be required. Based on SCAQMD guidance, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.⁶⁶ However,

⁶⁶ SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, August 2003.*

those projects that do not exceed the thresholds would not be cumulatively considerable. Therefore, since the Project would not exceed the thresholds for air quality pollutants, the Project's contribution to cumulative air quality impacts would not be cumulatively considerable. **As such, during construction and operation, the Project's contribution to air quality impacts would not be cumulatively considerable, and, therefore, the Project would have a less than significant cumulative impact to regional air quality.**

(2) Mitigation Measures

Cumulative impacts related to air quality would be less than significant during operation of the Project. Therefore, no additional mitigation measures are required.

(3) Level of Significance After Mitigation

Project and cumulative construction and operational air quality impacts were determined to be less than significant. When considered together with related projects, air quality impacts would not result in a cumulatively considerable impact. Therefore, the impact level remains less than significant.