3.2 Air Quality

This section discusses air quality in relation to the VAPP or Proposed Project. The section includes a discussion of regulatory requirements, the existing air quality within the Project area, and evaluates the potential for air quality impacts to occur as a result of Project construction and operation. As noted in the analysis below, impacts during both construction and operation would be less than significant and no mitigation measures are required. Supporting technical information and analyses are included as Appendix B (Air Quality Emissions and Greenhouse Gas Calculations) of this EIR.

3.2.1 Regulatory Setting

A review of the various federal, state, regional, and local government regulatory requirements was conducted to identify regulations that applicable to the Proposed Project relative to air quality. This section summarizes the various regulatory requirements that are relevant to the Proposed Project.

At the federal level, the U.S. Environmental Protection Agency (EPA) is responsible for implementation of the Clean Air Act (CAA). Some portions of the CAA (e.g., certain mobile-source and other requirements) are implemented directly by EPA; others (e.g., stationary-source requirements) are implemented by state and local agencies.

Responsibility for regulating air quality in California is shared between the California Air Resources Board (ARB) and the regional air quality districts. Areas of control for the regional districts are set by ARB, which divides the state into air basins (see Figure 3.2-1 for the boundaries of the South Coast Air Basin relative to the Proposed Project). ARB has establishes and runs programs for cleaner air ranging from research and regulation to enforcement and education. Specifically, ARB:

- Establishes and enforces emission standards for motor vehicles, fuels and consumer products.
- Has new authority to control climate change emissions.
- Establishes health-based air quality standards.
- Conducts research.
- Monitors air quality.
- Identifies and establishes control measures for toxic air contaminants.
- Provides compliance assistance for businesses.
- Produces education and outreach programs and materials.
- Oversees and assists local air quality districts, which regulate most non-vehicular sources of air pollution (ARB 2009).

The Proposed Project lies within the Los Angeles County portion of the South Coast Air Basin (Basin), which is under the jurisdiction of South Coast Air Quality Management District (SCAQMD). SCAQMD has jurisdiction over an area of approximately 10,743 square miles, including all of Orange County; Los Angeles County, except for the Antelope Valley; the non-desert portion of western San Bernardino County; and the western and Coachella Valley portions of Riverside County. The Basin is a sub-region of SCAQMD's jurisdiction.

SCAQMD is responsible for preparing the portion of the State Implementation Plan (SIP) applicable within its boundaries; adoption of control regulations for stationary sources; and implementation of indirect source and transportation control measures (e.g. employee ridesharing rules).

- Issuance of Permits: Under state law and district rules, every piece of equipment that emits or controls air pollution must have a permit to operate from the local air district. The equipment cannot be constructed without a district permit to construct. The district staff must issue the permit if the equipment will comply with all emission limitations in district rules.
- Enforcement: Permit requirements and district rules can be enforced by districts through actions for civil penalties (up to $75,000 per day of violation for individuals and up to $1 million per day for corporations), by local prosecutors through actions for misdemeanor criminal penalties, and by either seeking injunctive orders or orders of abatement.
- Hearing Boards: Hearing Boards in each district are authorized to issue temporary variances to sources having difficulty complying with air pollution rules. Hearing Boards can also hear appeals of permit decisions by the district staff, and can issue orders for abatement (SCAQMD, no date).

A discussion of the relevant air pollutants that are subject to regulatory control are discussed below, followed by a discussion of plans, policies, and regulations at the federal, state, and local level relevant to the Proposed Project.

3.2.1.1 Relevant Air Pollutants

Criteria Pollutants

The federal and state governments have established national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS), respectively, for six criteria pollutants: ozone, carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and particulate matter (PM), which consists of PM 10 microns in diameter or less (PM10) and PM 2.5 microns in diameter or less (PM2.5).

Ozone and NO_2 are considered regional pollutants because they (or their precursors) affect air quality on a regional scale; NO_2 reacts photochemically with reactive organic gases (ROGs) to form ozone, and this reaction occurs at some distance downwind of the source of pollutants. Pollutants such as CO, SO_2, and Pb are considered to be local pollutants that tend to accumulate in the air locally. Particulate matter is considered to be a local as well as a regional pollutant.

The primary pollutants of concern in the study area are ozone (including nitrogen oxides), CO, and PM. Principal characteristics surrounding these pollutants are discussed below. Toxic air contaminants (TACs) are also discussed, although no air quality standards exist for these pollutants. The descriptions of criteria pollutants below are based on the Final Program Environmental Impact Report prepared for the 2012 SCAQMD Air Quality Management Plan (SCAQMD 2012).

Ozone

Ozone (O_3), a colorless gas with a sharp odor, is a highly reactive form of oxygen. High ozone concentrations exist naturally in the stratosphere. Some mixing of stratospheric ozone downward through the troposphere to the earth's surface does occur; however, the extent of ozone transport is limited. At the earth's surface in sites remote from urban areas, ozone concentrations are normally very low (e.g., from 0.03 ppm to 0.05 ppm).

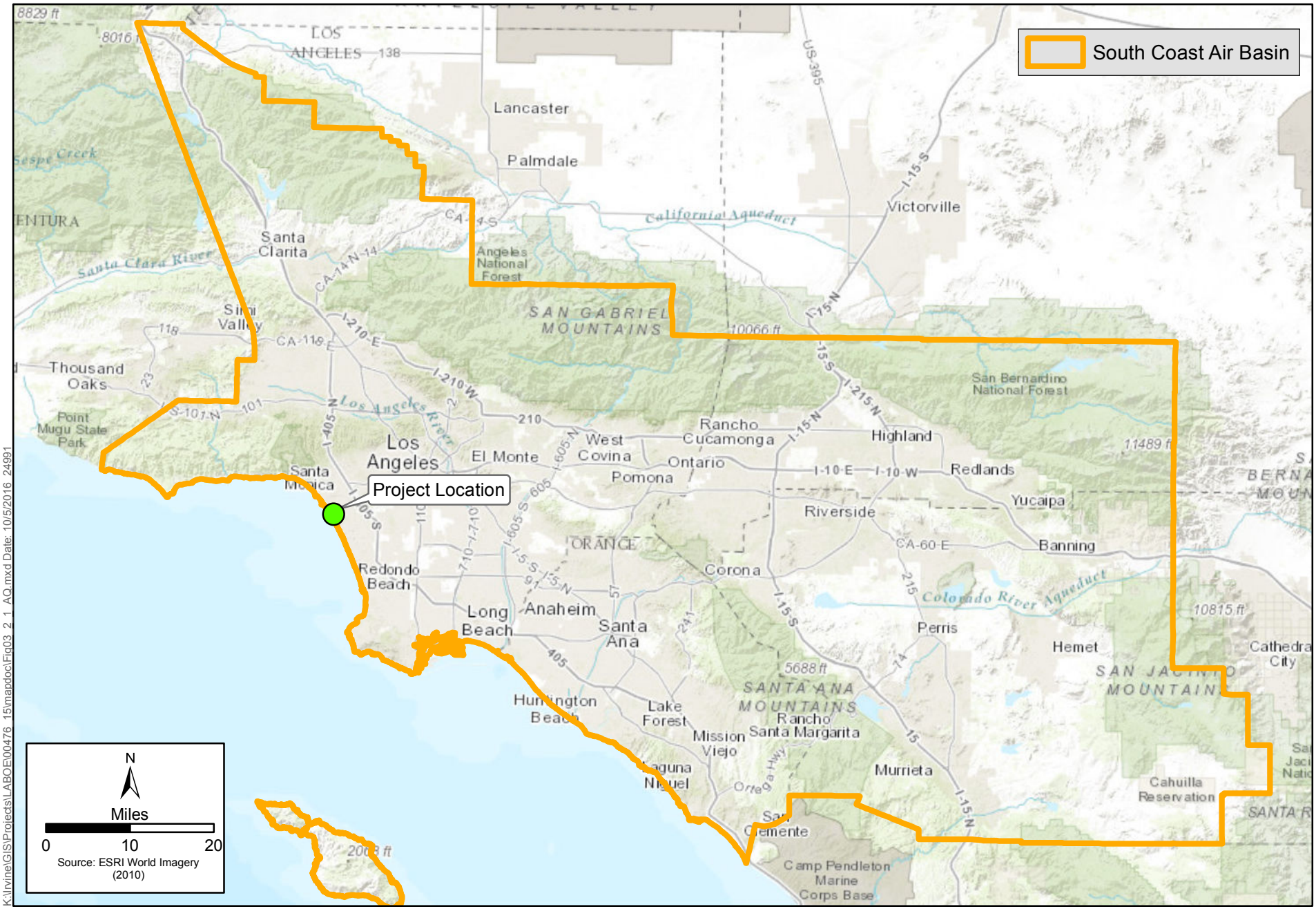

Figure 3.2-1
South Coast Air Basin
Venice Auxiliary Pumping Plant Project

While ozone is beneficial in the stratosphere because it filters out skin-cancer-causing ultraviolet radiation, it is a highly reactive oxidant. It is this reactivity that accounts for its damaging effects on materials, plants, and human health at the earth's surface. The propensity of ozone for reacting with organic materials causes it to be damaging to living cells and ambient ozone concentrations in the Basin are frequently sufficient to cause health effects. Ozone enters the human body primarily through the respiratory tract and causes respiratory irritation and discomfort, makes breathing more difficult during exercise, and reduces the respiratory system's ability to remove inhaled particles and fight infection. Individuals exercising outdoors, children and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for ozone effects.

Short-term exposures (lasting for a few hours) to ozone at levels typically observed in southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high ozone communities. Elevated ozone levels are also associated with increased school absences. Ozone exposure under exercising conditions is known to increase the severity of the abovementioned observed responses. Animal studies suggest that exposures to a combination of pollutants that include ozone may be more toxic than exposure to ozone alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

Nitrogen Oxides

NO_2 is a reddish-brown gas with a bleach-like odor. Nitric oxide (NO) is a colorless gas, formed from the nitrogen (N_2) and oxygen (O_2) in air under conditions of high temperature and pressure which are generally present during combustion of fuels; NO reacts rapidly with the oxygen in air to form NO_2. NO_2 is responsible for the brownish tinge of polluted air. The two gases, NO and NO_2, are referred to collectively as NOx. In the presence of sunlight, NO_2 reacts to form nitric oxide and an oxygen atom. The oxygen atom can react further to form ozone, via a complex series of chemical reactions involving hydrocarbons. Nitrogen dioxide may also react to form nitric acid (HNO3) which reacts further to form nitrates, components of PM2.5 and PM10.

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO_2 in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma and/or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. More recent studies have found associations between NO_2 exposures and cardiopulmonary mortality, decreased lung function, respiratory symptoms and emergency room asthma visits. In animals, exposure to levels of NO2 considerably higher than ambient concentrations results in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of ozone exposure increases when animals are exposed to a combination of ozone and NO_2.

Carbon Monoxide

CO is a colorless, odorless, relatively inert gas. It is a trace constituent in the unpolluted troposphere, and is produced by both natural processes and human activities. In remote areas far from human habitation, carbon monoxide occurs in the atmosphere at an average background concentration of 0.04 ppm, primarily as a result of natural processes such as forest fires and the oxidation of methane. Global atmospheric mixing of CO from urban and industrial sources creates higher background concentrations (up to 0.20 ppm) near urban areas.

The major source of CO in urban areas is incomplete combustion of carbon-containing fuels, mainly gasoline. According to the 2007 AQMP, in 2002, the inventory baseline year, approximately 98 percent of the CO emitted into the Basin's atmosphere was from mobile sources. Consequently, CO concentrations are generally highest in the vicinity of major concentrations of vehicular traffic. CO is a primary pollutant, meaning that it is directly emitted into the air, not formed in the atmosphere by chemical reaction of precursors, as is the case with ozone and other secondary pollutants. Ambient concentrations of CO in the Basin exhibit large spatial and temporal variations due to variations in the rate at which CO is emitted and in the meteorological conditions that govern transport and dilution. Unlike ozone, CO tends to reach high concentrations in the fall and winter months. The highest concentrations frequently occur on weekdays at times consistent with rush hour traffic and late night during the coolest, most stable portion of the day.

Particulate Matter

Of great concern to public health are the particles small enough to be inhaled into the deepest parts of the lung. Respirable particles (particulate matter less than about 10 micrometers in diameter) can accumulate in the respiratory system and aggravate health problems such as asthma, bronchitis, and other lung diseases. Children, the elderly, exercising adults, and those suffering from asthma are especially vulnerable to adverse health effects of PM10 and PM2.5.

A consistent correlation between elevated ambient PM10 and PM2.5 levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. Studies have reported an association between long-term exposure to air pollution dominated by PM2.5 and increased mortality, reduction in life-span, and an increased mortality from lung cancer.

Daily fluctuations in fine particulate matter concentration levels have also been related to hospital admissions for acute respiratory conditions, to school and kindergarten absences, to a decrease in respiratory function in normal children, and to increased medication use in children and adults with asthma. Studies have also shown lung function growth in children is reduced with long-term exposure to particulate matter. In addition to children, the elderly, and people with pre-existing respiratory and/or cardiovascular disease appear to be more susceptible to the effects of PM10 and PM2.5.

Sulfur Oxides

SO_2 is a colorless gas with a sharp odor. It reacts in the air to form sulfuric acid (H_2SO_4), which contributes to acid precipitation, and sulfates, which are components of PM10 and PM2.5. Most of the SO_2 emitted into the atmosphere is produced by burning sulfur-containing fuels. Exposure of a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics. All asthmatics

are sensitive to the effects of SO_2. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, is observed after acute higher exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO_2.

Lead

Lead in the atmosphere is present as a mixture of a number of lead compounds. Leaded gasoline and lead smelters have been the main sources of lead emitted into the air. Due to the phasing out of leaded gasoline, there was a dramatic reduction in atmospheric lead in the Basin over the past three decades.

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure.

Lead poisoning can cause anemia, lethargy, seizures, and death. It appears that there are no direct effects of lead on the respiratory system. Lead can be stored in the bone from early age environmental exposure, and elevated blood lead levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland), and osteoporosis (breakdown of bone tissue). Fetuses and breast-fed babies can be exposed to higher levels of lead because of previous environmental lead exposure of their mothers.

Toxic Air Contaminants

Although NAAQS and CAAQS exist for criteria pollutants, no ambient standards exist for Toxic Air Contaminants (TACs). Many pollutants are identified as TACs because of their potential to increase the risk of developing cancer or because of their acute or chronic health risks. For TACs that are known or suspected carcinogens, the ARB has consistently found that there are no levels or thresholds below which exposure is risk-free. Individual TACs vary greatly in the risks they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs are identified and their toxicity is studied by the California Office of Environmental Health Hazard Assessment (OEHHA). TACs include air pollutants that can produce adverse human health effects, including carcinogenic effects, after short-term (acute) or long-term (chronic) exposure. Examples of TAC sources include industrial processes, dry cleaners, gasoline stations, paint and solvent operations, and fossil fuel combustion sources (including diesel particulate matter[DPM]). For certain TACs, a unit risk factor can be developed to evaluate cancer risk. For acute and chronic health risks, a similar factor, called a Hazard Index, is used to evaluate risk.

3.2.1.2 Applicable Regulations

Federal

The CAA establishes the National Ambient Air Quality Standards (NAAQS) for maximum concentrations of a particular pollutant and specifies future dates for achieving compliance, it was first enacted in 1963, but has been amended numerous times in subsequent years (1967, 1970, 1977, and 1990). The CAA identifies two types of national ambient air quality standards. Primary standards provide public health protection, including protecting the health of "sensitive"

populations such as asthmatics, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. The CAA mandates that the state submit a State Implementation Plan (SIP) for regions that fail to meet the standards. The plans must include pollution control measures that demonstrate how the standards will be met. The City of Los Angeles is within the South Coast Air Basin, which is designated as a nonattainment area for certain pollutants that are regulated under the CAA.

The 1990 amendments to the CAA identify specific emissions-reduction goals for areas that fail to meet the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or meet interim milestones. The sections of the CAA that would most substantially affect development of the Proposed Project include Title I (Nonattainment Provisions) and Title II (Mobile-Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for criteria pollutants. Table 3.2-1 shows the NAAQS that are currently in effect for each criteria pollutant. The NAAQS were amended in July 1997 to include an 8-hour standard for O_3 and adopt a standard for PM2.5. The 8-hour ozone NAAQS was further amended in October 2015. EPA will designate ozone attainment and nonattainment areas in late 2017.

State

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practical date. The CAAQS incorporate additional standards for most of the criteria pollutants and set standards for other pollutants recognized by the state. In general, the California standards are more health protective than the corresponding NAAQS. California has also set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles that are not included in the NAAQS. The Basin is in compliance with the California standards for sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. As is the case with the NAAQS, compliance dates for attainment of the CAAQS have been set according to the severity of the violation of the standards. Table 3.2-1 details the current NAAQS and CAAQS, and Table 3.2-2 provides the Los Angeles County portion of the Basin's attainment status with respect to NAAQS and CAAQS.

Toxic Air Contaminants

With respect to criteria pollutants, federal and/or state ambient air quality standards (AAQS) represent the exposure level (with an adequate margin of safety) deemed safe for humans. No AAQS exist for TACs because no exposure level has been deemed safe for humans. Pollutants are identified as TACs because of their potential to increase the risk of developing cancer or their acute or chronic health risks. For TACs that are known or suspected carcinogens, ARB has consistently found that there are no levels or thresholds below which exposure is risk free. Individual TACs vary greatly in the risk they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. For certain TACs, a unit risk factor can be developed to evaluate cancer risk. For acute and chronic health risks, a similar factor, called a Hazard Index, is used to evaluate risk. In the early 1980s, ARB established a statewide comprehensive air toxics program to reduce exposure to air toxics. The Toxic Air Contaminant Identification and Control Act (Assembly Bill [AB] 1807) created California's program to reduce exposure to air toxics. The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) supplements the AB 1807 program by requiring a statewide air toxics inventory,

Table 3.2-1. Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	CAAQS[a]	NAAQS[b]
Ozone (O_3)	1 hour	0.09 ppm[c]	—
	8 hour	0.070 ppm	0.070 ppm
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm
	8 hour	9.0 ppm	9 ppm
Nitrogen Dioxide (NO_2)	1 hour	0.18 ppm	100 ppb
	Annual Arithmetic Mean	0.030 ppm	53 ppb
Sulfur Dioxide (SO_2)	1 hour	0.25 ppm	75 ppb
	24 hour	0.04 ppm	0.14 ppm
Respirable Particulate Matter (PM10)	24 hour	50 µg/m^3 [c]	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	—
Fine Particulate Matter (PM2.5)	24 hour	—	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	12.0 µg/m^3
Sulfates	24 hour	25 µg/m^3	—
Lead (Pb)	30 day average	1.5 µg/m^3	—
	Calendar quarter	—	1.5 µg/m^3
	Rolling 3-Month Average	—	0.15 µg/m^3
Hydrogen Sulfide	1 hour	0.03 ppm	—
Vinyl Chloride	24 hour	0.01 ppm	—

Notes:
[a] The CAAQS for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, PM_{10}, and $PM_{2.5}$ are values not to be exceeded. All other California standards shown are values not to be equaled or exceeded.
[b] The NAAQS, other than O_3 and those pollutants using annual arithmetic mean, are not to be exceeded more than once a year. The O_3 standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above the standard is equal to or less than 1.
[c] ppm = parts per million by volume; ppb = parts per billion; µg/m^3 = micrograms per cubic meter.
Source: California Air Resources Board, 2015a.

Table 3.2-2. Federal and State Attainment Status for the Los Angeles County Portion of the South Coast Air Basin

Pollutants	**Federal Classification**	**State Classification**
O_3 (1-hour standard)	—	Nonattainment
O_3 (8-hour standard)	Nonattainment, Extreme	Nonattainment
PM10	Attainment/Maintenance	Nonattainment
PM2.5	Nonattainment	Nonattainment
CO	Attainment/Maintenance	Attainment
NO_2	Attainment/Maintenance	Attainment
SO_2	Attainment	Attainment
Pb	Nonattainment	Attainment

Note that only the Los Angeles County portion of the South Coast Air Basin is nonattainment for NAAQS Pb. The remainder of the Basin is attainment.
Sources: ARB 2013b; EPA 2015; ICF, 2016.

notification of people exposed to a significant health risk, and facility plans to reduce these risks (ARB 2010). AB 2588 requires local air districts like SCAQMD to designate high, intermediate, and low priority categories and report on facilities that may pose a risk to the public.

To date, ARB has identified 21 TACs and adopted EPA's list of hazardous air pollutants as TACs. In August 1998, ARB identified diesel exhaust particulate matter (DPM) emissions as a TAC (ARB 1998). In September 2000, ARB approved a comprehensive diesel risk reduction plan to reduce emissions from both new and existing diesel-fueled engines and vehicles. The goal of the plan was to reduce DPM emissions and the associated health risk by 75 percent by 2010 and by 85 percent by 2020 (ARB 2000).

Local

South Coast Air Quality Management District

SCAQMD has adopted a series of air quality management plans (AQMPs), which are components of the SIP developed to meet the CAAQS and NAAQS in nonattainment areas. These plans require, among other emissions-reducing activities, control technology for existing sources, control programs for area sources and indirect sources, an SCAQMD permitting system that allows no net increase in emissions from any new or modified (i.e., previously permitted) emissions sources, and transportation control measures. The most recent AQMP is the 2012 AQMP, adopted by SCAQMD's Governing Board on December 7, 2012. ARB approved the 2012 AQMP on January 25, 2013, and the plan was submitted to EPA as a revision to the California SIP (ARB 2013a). The 2012 AQMP addresses CAA requirements and includes a 24-hour PM2.5 plan; additional 8-hour O_3 measures, with a vehicle-miles-traveled (VMT) offset demonstration; and a 1-hour O_3 attainment demonstration with VMT offset demonstration. SCAQMD is in the process of developing the 2016 AQMP, which will be primarily focused on addressing the ozone and PM2.5 standards. SCAQMD released the Draft 2016 AQMP for public review in June 2016 and SCAQMD's Governing Board will consider adoption of the Final 2016 AQMP in December 2016.

SCAQMD published the *CEQA Air Quality Handbook* in November 1993[1] to help local governments analyze and mitigate project-specific air quality impacts. This handbook provides standards, methodologies, and procedures for conducting air quality analyses as part of CEQA documents prepared within its jurisdiction. In addition, SCAQMD published two additional guidance documents, *Localized Significance Threshold Methodology for CEQA Evaluations* (2003, revised 2008) and *Particulate Matter (PM) 2.5 Significance Thresholds and Calculation Methodology* (2006). These publications provide guidance for evaluating localized effects from mass emissions during construction. Both were used in the preparation of this analysis (SCAQMD 2006, 2008a).

Through the attainment planning process, SCAQMD develops rules and regulations to address the sources of air pollution in the Basin (SCAQMD 2015a). The majority of emissions sources associated with the Proposed Project are from electricity, generated by facilities associated with the Los Angeles Department of Water and Power (LADWP) and therefore, the Proposed Project is not subject to SCAQMD stationary-source rules, such as Regulation XIII (New Source Review), Rule 1401 (New Source Review of Toxic Air Contaminants), and Rule 431.2 (Sulfur Content of Liquid Fuels). Nevertheless, the Proposed Project is subject to the adopted SCAQMD rules and regulations listed below, including rules regarding the backup generator.

[1] Section updates provided on SCAQMD's website: http://www.aqmd.gov/ceqa/hdbk.html

SCAQMD Rule 402—Nuisance. This rule prohibits the discharge of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; endanger the comfort, repose, health, or safety of any such persons or the public; or cause, or have a natural tendency to cause, injury or damage to business or property. Odors are regulated under this rule.

SCAQMD Rule 403—Fugitive Dust. This rule prohibits emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area that remains visible beyond the property line of the emission's source. During construction of the Proposed Project, best available control measures identified in the rule would be required to minimize fugitive dust emissions from earthmoving and grading activities. These measures would include site pre-watering and re-watering as necessary to maintain sufficient soil moisture content.

SCAQMD Rule 1108—Cutback Asphalt. This rule specifies VOC content limits for cutback asphalt, a liquid petroleum product used during road construction activities.

SCAQMD Rule 1470—Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. This rule specifies requirements for stationary diesel engines, including emergency standby generators. It requires owners or operators of emergency standby generators to keep monthly logs of usage, limits maintenance and testing to 20 hours per year, and requires emission rates to not exceed 0.40 grams per brake-horsepower hour (g/bhp-hr).

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties. SCAG addresses regional issues related to transportation, the economy, community development, and the environment, and is the federally-designated metropolitan planning organization (MPO) for a majority of the region and the largest MPO in the nation. As required by federal and state law, SCAG develops plans pertaining to transportation, growth management, hazardous waste management, housing, and air quality. SCAG data are used in the preparation of air quality forecasts and the consistency analysis included in the AQMP.

City of Los Angeles

The Air Quality Element of the City's General Plan (adopted by City Council on November 24, 1992) specifies goals, objectives, and policies to maintain clean air within the City and achieve consistency with regional air quality planning by SCAQMD and SCAG and to minimize health risks posed by air pollution sources (City of Los Angeles 1992).

The City does not have the authority to directly regulate air quality; however, the City addresses nuisances, including odors. The City has developed a Sewer System Management Plan (SSMP) (2015), which addresses odors generated from sewer gases. The SSMP includes an odor complaint contact number and tracking of occurrences via a geographic information system (GIS) management database, which allows quick identification and visualization of problem areas that can be prioritized for inspection, maintenance, and repairs. The City has a four-pronged approach to odor control: regular maintenance, system-wide treatment, site-specific corrective action, and capital improvement, including new and state-of-the-art odor control facilities. Most odor problems are resolved by regular cleaning or site-specific treatments. The City has also built permanent odor treatment facilities at strategic locations along major interceptors. These new odor facilities capture hydrogen sulfide through the use of fans and treat sewer gases using highly advanced treatment technologies.

3.2.2 Environmental Setting

3.2.2.1 Regional Setting

Regional Climate

The Project Site is within the Los Angeles Basin, which covers approximately 6,745 square miles and is bounded by the Pacific Ocean to the west and south and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Basin, which is a coastal plain with connecting broad valleys and low hills.

The Basin lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild and 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 Basin is a function of the area's natural physical characteristics (weather and topography), as well as human-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Basin, making it an area of high pollution potential.

Regional Air Quality

The greatest air pollution impacts in the Basin occur from June through September. These are generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This condition frequently reduces pollutant dispersion, thereby causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season, and time of day. O_3 concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Basin and adjacent desert.

With regards to attainment status, The Los Angeles County portion of the Basin fails to meet national standards for O_3, PM10, PM2.5, and lead and state standards for O_3, PM10, and PM2.5. In addition, the Los Angeles County portion of the Basin is considered a maintenance area for national CO, NO_2, and PM10 standards.

With regards to TACs, SCAQMD has completed ambient air monitoring and evaluation studies in the Basin, called Multiple Air Toxics Exposure Study (MATES). The most recent is the MATES IV study, released to the public in May 2015. The MATES IV study concluded that the average carcinogenic risk throughout the Basin attributed to TACs is approximately 1,023 in one million. About 68.2% of all risk is attributed to diesel particulate matter (DPM) emissions, but DPM showed a 70% reduction compared to MATES III (SCAQMD 2015b).

3.2.2.2 Local Setting

Local Climate

Data from the closest climate monitoring station—Western Regional Climate Center's (WRCC's) Santa Monica Pier Station (approximately 3 miles north of the Project Site)—were used to characterize Project vicinity climate conditions. Over the period of record (1937-2015), summer

high and low temperatures average 71°F and 61°F, while the winter high and low temperatures average 64°F and 50°F, respectively. Rainfall varies widely from year to year, with an annual average of 13 inches, with the majority of rainfall falling between December and March (WRCC 2016a).

The closest wind monitoring station is the Santa Monica Airport wind monitoring station, which is approximately 3 miles north of the Project Site. Wind patterns in the Project vicinity arise primarily from the southwest with an average speed of 6 miles per hour (WRCC 2016a).

Local Air Quality

In order to monitor local air quality, SCAQMD, divides the Basin into air monitoring areas, and maintains a network of air quality monitoring stations. The Project Site is in the Northwest Coastal LA County Monitoring Area (Source Receptor Area [SRA] 2). The monitoring station within SRA 2 is the West Los Angeles-VA Hospital monitoring station (ARB 70091) near Wilshire Boulevard and Sawtelle Boulevard, 5 miles north of the Project Site. Criteria pollutants monitored at the West Los Angeles-VA Hospital monitoring station include O_3, CO, and NO_2.

Because not all criteria pollutants are monitored at the West LA-VA monitoring station, additional monitoring data have been provided from the Los Angeles-Westchester Parkway monitoring station (ARB 70111) and the Compton-700 North Bullis Road monitoring station (ARB 70112). The Los Angeles-Westchester Parkway monitoring station, located 2.5 miles south of the Project Site in SRA 3, is the closest monitoring station to the Project Site and provides additional setting detail, including PM10 data. The Compton-700 North Bullis Road monitoring station, located 16 miles southeast of the Project Site, is the closest monitoring station that monitors PM2.5. Table 3.2-3 shows air quality monitoring data in the project area.

Table 3.2-3. Ambient Background Concentrations from the West Los Angeles-VA Hospital (ARB 70091), Los Angeles – Westchester Parkway (ARB 70111) and Compton – 700 N Bullis Road (ARB 70112) Monitoring Stations

Pollutant Standards	2012	2013	2014
1-Hour Ozone (O_3) - West Los Angeles-VA Hospital (ARB 70091)			
State Maximum Concentration (ppm)	0.093	0.088	0.116
Number of Days Standard Exceeded			
CAAQS 1-hour Standard (> 0.09 ppm)	0	0	1
8-Hour Ozone (O_3) - West Los Angeles-VA Hospital (ARB 70091)			
State Maximum Concentration (ppm)	0.074	0.076	0.095
National Maximum Concentration (ppm)	0.073	0.075	0.094
National Fourth-Highest Concentration (ppm)	0.067	0.065	0.085
National Design Value (ppm)	0.065	0.062	0.067
Number of Days Standard Exceeded			
CAAQS 8-hour Standard (> 0.070 ppm)	0	0	4
NAAQS 8-hour Standard (> 0.075 ppm)	1	1	6
Carbon Monoxide (CO) - West Los Angeles-VA Hospital (ARB 70091)			
Maximum Concentration 8-hour Period (ppm)	1.15	N/A	N/A
Number of Days Standard Exceeded			
NAAQS 8-hour Standard (≥ 9 ppm)	0	N/A	N/A
CAAQS 8-hour Standard (≥ 9.0 ppm)	0	N/A	N/A

Pollutant Standards	2012	2013	2014
Nitrogen Dioxide (NO_2) - West Los Angeles-VA Hospital (ARB 70091)			
Maximum National 1-hour Concentration (ppm)	0.0613	0.0512	0.0639
Maximum State 1-hour Concentration (ppm)	0.061	0.051	0.063
Annual Average Concentration (ppm)	N/A	N/A	N/A
Number of Days Standard Exceeded			
CAAQS 1-Hour Standard (0.18 ppm)	0	0	0
NAAQS 1-Hour Standard (100 ppb)	0	0	0
Suspended Particulates (PM10) - Los Angeles – Westchester Parkway (ARB 70111)			
Maximum State 24-hour Concentration (μg/m^3)	30.0	37.0	45.0
Maximum National 24-hour Concentration (μg/m^3)	31.0	38.0	46.0
State Annual Average Concentration (μg/m^3)	21	21	22
Number of Days Standard Exceeded			
CAAQS 24-hour Standard (> 50 μg/m^3)	0	0	0
NAAQS 24-hour Standard (> 150 μg/m^3) *(Estimated)*	0	0	0
Suspended Particulates (PM2.5) - Compton – 700 N Bullis Road (ARB 70112)			
Maximum National 24-hour Concentration (μg/m^3)	51.2	52.1	35.8
24-hour Standard 98th Percentile (μg/m^3)	30.3	24.3	30.9
National Annual Average Concentration (μg/m^3)	11.6	11.9	12.6
State Annual Average Concentration (μg/m^3)	11.7	N/A	N/A
Number of Days Standard Exceeded			
NAAQS 24-hour Standard (> 35 μg/m^3)	1	1	1

ppm = parts per million; ppb = parts per billion; μg/m^3 = micrograms per cubic meter; NA = data not available.
Sources: ARB 2015b; EPA 2015c; ICF, 2015.

Monitoring data show the following trends for pollutant concentrations: the 1-hour O_3 state standard was exceeded one time at the West LA-VA station; the 8-hour O_3 federal and state standards were exceeded multiple times at the West LA-VA station; and the 24-hour PM2.5 federal standard was exceeded once per year at the Compton station. There were no violations of the PM10 federal standard, CO federal or state standards, or NO_2 state standard. In general, pollutant concentrations are lower in the Project vicinity compared to other inland parts of the Basin due to the limited amount of nearby industrial uses in addition to the presence of regular coastal breezes that disperse pollutants.

3.2.2.3 Local Health Risk

According to SCAQMD inhalation cancer risk data from MATES IV, the Project area is within a cancer risk zone of approximately 747 in one million (SCAQMD 2016). For comparison, the cancer risk shown in the previous MATES study, MATES III, showed an average cancer risk of approximately 749 in one million. Overall, emissions have decreased within the Basin and air quality has improved since MATES III (SCAQMD 2015c).

3.2.2.4 Sensitive Receptors and Locations

SCAQMD defines sensitive receptor locations as residential, commercial, and industrial land use areas as well as other locations where sensitive populations may be located. Other sensitive receptor locations include schools, hospitals, convalescent homes, day care centers, and other locations where children, chronically ill individuals, or other sensitive persons could be exposed (SCAQMD 2005a).

Sensitive receptors within the Project vicinity include the surrounding residences, particularly the multi-family residences directly to the north, west, and east of the Proposed Project Site. The closest sensitive receptor is the multi-family residential complex to the north of the Project Site along Canal Court, which abuts the Project Site boundary. Other sensitive receptors include an elementary school, an elderly housing facility, and a convalescent home that are within the Project vicinity.

3.2.2.5 Odors

As discussed in Chapter 2 (Project Description), the existing VPP is equipped with an exhaust fan that discharges vapors through an existing stack, but field investigation of the ventilation fan shows that the flange that connects the fan to the dispersion stack is displaced, and odors can exit through the gap at the joint. Also, the use of aboveground rental pumps necessary during repairs to the existing pumps have been known to temporarily produce odors in the Project area.

3.2.2.6 Naturally Occurring Asbestos

Disturbance of rock and soil that contains naturally-occurring asbestos (NOA can result in consequent exposure to the public. Asbestos most commonly occurs in serpentine rock, and its parent material, ultramafic rock. Construction activities in areas known to contain ultramafic rocks may expose workers and the general public to NOA. According to the California Department of Conservation, the Basin does not contain NOA, except for Catalina Island where small ultramafic rock occurrences are present (SCAQMD 2005c).

3.2.3 Environmental Impact Analysis

3.2.3.1 Methodology

Construction Emissions

Construction of the Proposed Project would result in the short-term generation of criteria pollutant and TAC emissions. Mass daily combustion exhaust, fugitive dust (PM10 and PM2.5), and fugitive off-gassing paving emissions were estimated using SCAQMD's California Emissions Estimator Model (CalEEMod), version 2013.2.2 (SCAQMD 2013). CalEEMod estimates criteria pollutant and greenhouse gas (GHG) emissions associated with construction and operation of land use development projects. Each phase of construction would result in combustion exhaust emissions from on-site construction equipment, haul truck travel, material deliveries, and construction workers' commutes. The site preparation and grading/excavation phases would include fugitive dust and hauling emissions associated with up to 10,000 cubic yards of soil and asphalt removal, and it is assumed that the materials would be hauled off-site in trucks with a capacity to carry 7 cubic yards. Approximately 7,700 cubic yards would be stockpiled off-site and, once tested, approximately half of the volume would be brought to a local landfill, such as Sunshine Canyon Landfill located in Los Angeles for permanent storage. Construction equipment for each phase of construction was provided by the Project designer (Arcadis), with the exception that CalEEMod defaults were used for the architectural coating phase, which is based on Project acreage and building size. It was assumed that up to 20 workers would be required on the site for the foundation and building construction period. Construction is anticipated to begin in March 2018 and would take approximately 24 months to complete. Table 3.2-4 shows a summary of construction assumptions that were used to estimate construction-period emissions.

Table 3.2-4. Summary of Construction Assumptions

Construction Activity	Assumption
Construction Start Date	March 2018
Construction Duration	24 months
Equipment	Air Compressors Cement and Mortar Mixers Crane Concrete/Industrial Saws Forklifts Graders Pavers Rollers Excavators Tractors/Loaders/Backhoes Rubber Tired Dozers Bore/Drill Rigs Plate Compactors
Initial Off-Haul Excavation Materials	10,000 cubic yards
Stockpiled at Laydown Area 3 (Culver City)	*7,700 cubic yards (1,485 truck round trips)*
Stockpiled at Laydown Area 1	*2,300 cubic yards (444 truck round trips)*
Excavation Materials Returned to Site from Laydown Area 3	3,850 cubic yards (743 truck round trips)
Excavation Materials Sent to a Local Landfill from Laydown Area 3	3,850 cubic yards (743 truck round trips)
Due to the narrow street widths in the project vicinity, it was assumed that trucks with a capacity of 7 cubic yards would be used. This analysis also assumes a 35% allowance for soil expansion and less-than-full loads. Additional details related to construction assumptions are included in Appendix B of this EIR.	

Regarding localized effects, SCAQMD's localized significance threshold (LST) methodology was developed to aid in the analysis of construction associated with land use development projects. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The LST methodology directs analyses to focus on emissions from mobile construction equipment (i.e., excavators, graders, backhoes, generators, etc.) and stationary sources (i.e., natural gas furnaces, emergency generators, etc.). The LST methodology and lookup tables are not designed to evaluate localized impacts from mobile sources traveling over roadways. Therefore, the LST analysis only includes those emissions that would occur on-site, and does not include emissions from construction vehicle travel on public roadways.

In modeling emissions, it was assumed that the site preparation and grading phases would occur separately and that the building construction, asphalt paving, and architectural coatings phases would occur concurrently. For the purposes of this analysis, fugitive dust emissions assume compliance with SCAQMD Rule 403. According to SCAQMD guidance, Rule 403 would reduce fugitive dust emissions by 61 percent by watering three times per day (SCAQMD 2013). Emissions are

presented at the daily time scale (i.e., pounds per day [lbs/day]) and compared with SCAQMD's thresholds discussed in Section 3.2.4.2, below. All emissions calculation worksheets and air quality modeling output files are provided in Appendix B of this EIR.

Although diesel trucks would be used during the construction period, the vast majority of haul trips would be performed during the site preparation and grading/excavation phases, limited to approximately 6 months. This is shorter than the 30-year exposure assumed for residential cancer risks in SCAQMD guidance (SCAQMD 2015). Consequently, cancer risks related to the toxic air contaminants released during the construction period have not been quantified.

Odors are addressed in a qualitative manner, identifying the elements of Project construction or operation that have the potential to result in objectionable odors in the Project vicinity.

Operational Emissions

CalEEMod was also used to quantify impacts related to Project operation, including trips by employees, who would staff the plant 24 hours per day, 7 days a week, with two employees on-site per 8-hour shift. In addition, the modeling accounted for the energy use of the operational facility.

Project operation would involve occasional trips from those performing maintenance work on the submersible pumps, which would occur at least once annually. In addition, Project implementation may also require the occasional use of a 24-kW diesel generator to be used to provide backup power to VAPP in the event of loss of power. Due to their infrequency, maintenance activities and use of the generator were not quantified.

Regarding localized effects, SCAQMD's LST methodology was developed to aid in the analysis of operations associated with land use development projects. It directs analyses to focus on criteria pollutant emissions from stationary sources (i.e., natural gas furnaces, emergency generators, etc.) and mobile equipment (i.e., forklifts) operating on-site. The LST methodology and lookup tables are not designed to evaluate localized impacts from mobile sources traveling over roadways or to analyze the effects of TACs on nearby receptors. Therefore, the LST analysis only includes those criteria pollutant emission sources that would occur on-site, and does not include emissions from motor vehicles traveling on roadways. However, to provide a conservative analysis, the LST analysis does include emissions from on-site truck activity associated with idling on-site. Emissions from on-site sources would occur on the entire site. Although the site is smaller than one acre, a one-acre site is assumed herein, as this is the smallest site size for which LST thresholds are published. Further, because emissions would occur throughout the entire site, receptor distance was taken from the center of the Project Site, as opposed to the edges for the construction site. Therefore, a 25-meter (82 feet) receptor distance was utilized for the operational analysis herein, which is the shortest distance available in SCAQMD's LST methodology. Because Project operation would result in a minimal increase in the number of vehicle trips and would not increase congestion or reduce vehicle speeds at an intersection or roadway within a ¼-mile distance of a sensitive receptor, the potential for localized exceedances of the California 1-hour or 8-hour CO standard is considered negligible and is not addressed below. All emissions calculation worksheets and air quality modeling output files are provided in Appendix B of this EIR.

As discussed above, based on the limited number of diesel truck trips associated with Project maintenance activities and the infrequency of use of the 24-kW diesel generator, the health effects of toxic air contaminants, including DPM, were not quantified. Odors are addressed in a qualitative manner, identifying the elements of Project construction and operation that have the potential to result in objectionable odors in the Project vicinity.

Cumulative Impacts

In assessing cumulative construction impacts, the *L.A. CEQA Thresholds Guide* recommends the analysis review the related projects list and identify those projects with construction schedules that would coincide with the schedule of the Proposed Project. The *Thresholds Guide* recommends estimating the potential emissions from the related projects that would occur during construction of the Proposed Project, based on available information and, using the methodology above, determine the combined emissions for the Proposed and related projects.

In assessing cumulative operational impacts, the *L.A. CEQA Thresholds Guide* recommends the analysis review the list of related projects to identify those that would have pollutant or odor emissions. Based on the related projects, the analysis will determine the potential impacts of all such projects, together with the Proposed Project.

Similarly, SCAQMD recommends that Proposed Project be examined within the scope of the existing setting and that the examination take into account new and planned similar and nearby projects (SCAQMD 1993). Moreover, SCAQMD recommended the cumulative impact discussion consider consistency with the VMT and emission reduction targets and measures within the most recent AQMP (SCAQMD 1993). Further, SCAQMD thresholds have been established to support the AQMP and ensure attainment of the NAAQS and CAAQS. Therefore, an exceedance of SCAQMD threshold levels must be considered a significant cumulative impact and an adverse cumulative consequence.

The discussion below identifies potential Project impacts and the measures that would be required to mitigate impacts that are found to be potentially significant.

3.2.3.2 Screening Analysis

As noted in Section Chapter 1.0, Introduction, the analysis and conclusions contained in the Initial Study (see Appendix A [Notice of Preparation/Initial Study) of this EIR) prepared for the Proposed Project considered and then eliminated a number of impacts from further analysis, including those contained in CEQA Appendix G and the *L.A. CEQA Thresholds Guide* (2006). Therefore, only those impacts and corresponding thresholds of significance noted below were determined to require further analysis are addressed in this EIR.

3.2.3.3 Thresholds of Significance

State Significance Thresholds

The criteria used to determine the significance of an impact on air quality are based on Appendix G of the CEQA Guidelines (as well as those identified in the *L.A. CEQA Thresholds Guide* and the thresholds established by SCAQMD, which are discussed below under Regional and Local Significance Thresholds). According to Appendix G, a project would normally have a significant impact on air quality if it could result in:

- **AQ-1.** Conflict with or obstruct implementation of the applicable air quality plan;
- **AQ-2.** Violate any air quality standard or contribute substantially to an existing or projected air quality violation;

- **AQ-3.** 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- **AQ-4.** Expose sensitive receptors to substantial pollutant concentrations; or
- **AQ-5.** Create objectionable odors affecting a substantial number of people.

Regional and Local Significance Thresholds

Construction Emissions

As stated in the *L.A. CEQA Thresholds Guide* (2006), the City has not adopted a citywide significance threshold for construction emissions. Rather, it is the responsibility of the lead City department to determine the appropriate standards; in the absence of a department policy, the *Thresholds Guide* defers to SCAQMD's *CEQA Air Quality Handbook* and/or EPA's AP-42 emission factors and assessment methodologies. The *Thresholds Guide* reprints guidance from the *CEQA Air Quality Handbook* to assist in the evaluation of Project impacts, as determined appropriate by each lead agency (SCAQMD 1993). Project-related factors to be used in a case-by-case evaluation of significance include the following factors (B.1. Construction Emissions):

- Combustion Emissions from Construction Equipment:
  - Type, number of pieces and usage for each type of construction equipment;
  - Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
  - Emission factors for each type of equipment.
- Fugitive Dust
- Grading, Excavation, and Hauling
  - Amount of soil to be disturbed on-site or moved off-site;
  - Emission factors for disturbed soil;
  - Duration of grading, excavation and hauling activities;
  - Type and number of pieces of equipment to be used; and
  - Projected haul route.
- Heavy-Duty Equipment Travel on Unpaved Roads
  - Length and type of road;
  - Type, number of pieces, weight and usage of equipment; and

    Type of soil.
- Other Mobile Source Emissions
  - Number and average length of construction worker trips to Project Site, per day; and
  - Duration of construction activities.

In addition, SCAQMD's *CEQA Air Quality Handbook* contains a Screening Table for Construction based on construction emissions occurring over a three-month (quarterly) period (*CEQA Air Quality Handbook* 1993*:* pages 6-12). Given SCAQMD's regulatory role in the Basin, the significance thresholds and analysis methodologies established by SCAQMD are relied upon to make determinations regarding air quality impacts. The significance thresholds and analysis methodologies outlined in SCAQMD's *CEQA Air Quality Handbook*, *Localized Significance Threshold Methodology for CEQA Evaluations*, and *Particulate Matter (PM) 2.5 Significance Thresholds and Calculation Methodology* (2006) guidance documents were used in evaluating Project impacts. Specifically, SCAQMD construction and mass emissions thresholds identified in Table 3.2-5 were used for the regional assessment of criteria pollutants herein.

Table 3.2-5. SCAQMD Significance Thresholds (pounds per day)

	VOC	NO_X	CO	SO_2	PM10	PM2.5	Pb[a]
Construction							
Localized Significance Thresholds [b]	--	103	562	--	4.0	3.0	--
Regional Significance Thresholds	75	100	550	150	150	55	3
Operations							
Localized Significance Thresholds [b]	--	103	562	--	1.0	1.0	--
Regional Significance Thresholds	55	55	550	150	150	55	3

[a] The Proposed Project would result in no lead emissions during construction or operations. As such, lead emissions are not evaluated herein.

[b] Localized thresholds for construction and operations are based on a 1-acre Project Site and 25-meter distance to receptors within SRA 2. SCAQMD has not developed LSTs for VOC, SO_2, or Pb emissions.

Source: SCAQMD 2015e, 2015d; ICF, 2016.

With respect to localized emissions, SCAQMD has developed LSTs and mass rate look-up tables to help public agencies analyze the Project-related effects of pollutants on nearby receptors. The LSTs are based on the size or total area of the emissions source, the ambient air quality in each SRA where the emissions sources are located, and the distance to nearby sensitive receptor locations. The Project Site encompasses approximately 0.25 acre within the Northwest Los Angeles County Coastal Monitoring Area (SRA 2). Although the site is located adjacent to multi-family residences and the site is smaller than 1 acre, the analysis of impacts is based on a 25-meter receptor distance and a 1-acre site, the most conservative LSTs developed by SCAQMD.

Operational Emissions

According to the *L.A. CEQA Thresholds Guide* (2006) a Proposed Project would normally have a significant impact from project operations if any of the following would occur (B.2. Operational Emissions):

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the daily thresholds as identified in SCAQMD's *CEQA Air Quality Handbook*;
- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:
    - The Proposed Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or

- The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

- The Proposed Project creates an objectionable odor at the nearest sensitive receptor.

Toxic Air Contaminants

According to the *L.A. CEQA Thresholds Guide* (2006), the determination of significance related to Toxic Air Contaminants shall be made on a case-by-case basis, considering the following factors (B.3. Toxic Air Contaminants):

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

Additionally, consistent with SCAQMD guidelines, for the purposes of this EIR, the Proposed Project would have a significant impact from TACs if:

- Project-related emission sources, both stationary and mobile, emit carcinogenic or TACs that individually or cumulatively exceed the maximum incremental cancer risk of 10 in 1 million (1.0 x 10-5) or an acute or chronic Hazard Index of 1.0 (SCAQMD 2005b, 2015c).
- Hazardous materials associated with on-site stationary sources result in an accidental release of air toxic emissions or acutely hazardous materials, posing a threat to public health and safety (SCAQMD 1993).

Asbestos

SCAQMD also recommends a discussion of naturally occurring asbestos when siting sensitive land uses, particularly school sites. If a project would be located in an area moderately likely to contain NOA, then the impact shall be considered potentially significant without implementation of measures to reduce potential NOA exposure and resultant human health effects. Accordingly, NOA impacts in this analysis are considered significant if the project is located in an area moderately likely to contain NOA and fails to comply with all applicable NOA control measures. As discussed above, the Basin does not contain NOA, except for Catalina Island where small ultramafic rock occurrences are present (SCAQMD 2005c). **Thus, no impacts related to NOA would occur as a result of Project implementation, and no further discussion is required.**

3.2.3.4 Construction Impacts

The analysis below describes the temporary direct and indirect impacts on air quality anticipated as a result of the Proposed Project during construction.

AQ-1. Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Construction activities are considered consistent with the AQMP if they are in compliance with SCAQMD rules, such as Rule 403, which the Proposed Project would be. The Proposed Project would not conflict with or obstruct implementation of the AQMP and therefore, **impacts would be less than significant and no mitigation measures are required.**

AQ-2. Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation or expose sensitive receptors to substantial pollutant concentrations?

The Proposed Project would contribute to regional air pollutant emissions during short-term construction. An analysis of the construction-related effects of the Proposed Project is presented below.

Construction of the Proposed Project has the potential to create air quality impacts through the combustion emissions from heavy-duty construction equipment, construction workers' vehicle trips, material deliveries, and trips by heavy-duty haul trucks. In addition, earthwork activities would result in fugitive dust emissions, and emissions from grading, excavation and hauling on paved and unpaved roads. Paving operations would release VOCs from off-gassing (release of airborne particles). 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 assessment of construction air quality impacts considers each of these potential sources and accounts for the factors identified in the thresholds that must be considered (detailed assumptions for each of these factors used in the analysis are presented in Appendix B of this EIR). Fugitive PM10 and PM2.5 emissions estimates take into account compliance with SCAQMD Rule 403.

Regional construction-related emissions are shown in Table 3.2-6. The construction analysis, which utilized CalEEMod, assumes that the site preparation and grading phases would occur separately and that the building construction, asphalt paving, and architectural coatings phases would occur concurrently. The maximum day for NO_X, CO, PM10, and PM2.5 emissions are expected to occur during the grading phase. The maximum day for VOC/ROG emissions is expected to occur when the building construction/paving/coatings phases occurs. As shown in Table 3.2-6, maximum daily Project-related criteria pollutant emissions would not exceed SCAQMD construction-period regional thresholds for any pollutant. Consequently, the impact of construction-related emissions on regional air quality would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and as such, **impacts would be less than significant and no mitigation measures are required.**

Project construction would emit localized pollutants through the on-site use of heavy-duty construction equipment as well as fugitive dust from ground-disturbing activities. These localized emissions could expose nearby sensitive receptors to substantial pollutant concentrations.

With regards to localized emissions, localized construction-related emissions are shown in Table 3.2-7. The maximum day for VOC and SO_X emissions are expected to occur when building construction, paving, and architectural coatings would potentially overlap. The maximum day for NO_X, CO, PM10, and PM2.5 emissions is expected to occur during the grading phase. As shown in Table 3.2-7, localized emissions during construction would exceed the LST for PM10. With the implementation of **Mitigation Measure AQ-1**, which would require the use of Tier 3 construction equipment, emissions would be below the LST for PM10. Construction-period emissions with the implementation of **Mitigation Measure AQ-1** are shown in Table 3.2-8. **Consequently, the impact of construction-related emissions on local air quality would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and as such, would be less than significant with the implementation of Mitigation Measure AQ-1.**

Table 3.2-6. Estimate of Regional Construction Emissions (pounds per day)

Construction Phase	VOC	NO_X	CO	SO_X	PM10	PM2.5
Site Preparation	2	19	12	< 1	1	1
Grading and Excavation	4	38	33	< 1	5	3
Building Construction	2	19	13	< 1	1	1
Paving	1	7	8	< 1	1	< 1
Coating	8	2	2	< 1	< 1	< 1
Maximum Concurrent Daily Emissions	**10**	**38**	**33**	**< 1**	**5**	**3**
SCAQMD Regional Construction Threshold	75	100	550	150	150	55
Exceed Significance Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod modeling by ICF, 2016 (Appendix B of this EIR).

Table 3.2-7. Estimate of Localized Construction Emissions (pounds per day)

Construction Phase	VOC	NO_X	CO	SO_X	PM10	PM2.5
Site Preparation	2	19	12	< 1	1	1
Grading and Excavation	3	29	22	< 1	4.4	3.0
Building Construction	2	18	12	< 1	1	1
Paving	1	7	7	< 1	< 1	< 1
Coating	8	2	2	< 1	< 1	< 1
Maximum Concurrent Daily Emissions	**10**	**29**	**22**	**< 1**	**4.4**	**3.0**
SCAQMD Localized Significance Threshold	N/A	103	562	N/A	4.0	3.0
Exceed Significance Threshold?	N/A	**No**	**No**	N/A	**Yes**	**No**

N/A: Not applicable; SCAQMD has no localized significance thresholds for VOC or SO_X
Source: CalEEMod modeling by ICF, 2016 (Appendix B of this EIR).

Table 3.2-8. Estimate of Localized Construction Emissions Mitigated with Tier 3 Equipment (pounds per day)

Construction Phase	VOC	NO_X	CO	SO_X	PM10	PM2.5
Site Preparation	0	9	13	< 1	< 1	< 1
Grading and Excavation	1	13	18	< 1	3.5	2.2
Building Construction	1	12	15	< 1	1	1
Paving	< 1	5	7	< 1	< 1	< 1
Coating	8	1	2	< 1	< 1	< 1
Maximum Concurrent Daily Emissions	**10**	**18**	**23**	**< 1**	**3.5**	**2.2**
SCAQMD Localized Significance Threshold	N/A	103	562	N/A	4	3
Exceed Significance Threshold?	N/A	**No**	**No**	N/A	**No**	**No**

N/A: Not applicable; SCAQMD has no localized significance thresholds for VOC or SO_X
Source: CalEEMod modeling by ICF 2016 (Appendix B of this EIR).

Diesel trucks would be used during the construction period, resulting in emissions of TACs, particularly DPM. Although DPM would be emitted during the construction period, the period of exposure to residents neighboring the site would be limited to approximately 6 months when most of the diesel trucks hauling materials would be used. This is shorter than the 30-year exposure assumed for residential cancer risks in SCAQMD guidance (SCAQMD 2015). Given that neither the regional nor the localized emissions thresholds would be exceeded with the implementation of **Mitigation Measure AQ-1**, as shown in Tables 3.2-6 through 3.2-8, above, emissions emanating from the Project Site would not violate any air quality standard. **In addition, emissions would not contribute substantially to an existing or projected air quality violation or expose sensitive receptors to substantial pollutant concentrations and as such, impacts would be less than significant.**

AQ-3. 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?

As discussed above, the Basin is a federal nonattainment area for ozone, PM2.5, and Pb and state nonattainment area for ozone, PM10, and PM2.5. As shown in Table 3.2-6, emissions of regional pollutants during the construction-period would not exceed SCAQMD thresholds. Given that SCAQMD's thresholds were developed to ensure that impacts at the Project level would not hinder regional attainment, the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment. Furthermore, construction-period emissions would be short-term in nature and would occur over 24 months, with no long-term construction-related emissions. **Impacts would be less than significant, and no mitigation measures are required.**

AQ-4. Would the Project expose sensitive receptors to substantial pollutant concentrations?

As shown in Table 3.2-8, construction of the Proposed Project, with the implementation of **Mitigation Measure AQ-1**, would not result in an exceedance of LSTs such that significant impacts on sensitive receptors would occur. The TAC exposure period for sensitive receptors would be

substantially less than the 30-year exposure assumed for residential cancer risks in SCAQMD guidance (SCAQMD 2015). **Therefore, impacts related to sensitive receptors during the construction period would be less than significant.**

AQ-5. Would the Project create objectionable odors affecting a substantial number of people?

During the construction period, site preparation and excavation activities could involve the short-term generation of odors in the vicinity of the Project, mostly related to diesel exhaust from construction equipment. No odors during the connection of the diversion structure to the Coastal Interceptor Sewer located within the Grand Canal or while testing the three submersible pumps are expected to occur, since these activities would occur underground within the sealed valve and metering vault.

During construction of the coffer dam within the Grand Canal, sediment that contains organic material would be extracted which could result in odors when removed from the ground if not properly handled. Once these materials are removed, they would be temporarily stored in Laydown Areas 1 and 3. Various odors may be emitted from the sediment piles during construction that may impact the sensitive receptors in the Project area. However, best management practices will be used to address any potential odors. During the dewatering process, there could be some localized odor when the dewatered dredge material kept onsite on Laydown Area 1 and when it is transferred from the site to Laydown Area 3 via haul trucks. Since the haul truck trailers would be lined to prevent incidental seepage and covered during transport, significant odor impacts are not expected to occur during the handling and transportation of dewatered dredge material. As such, construction odors not result in a **less-than-significant impact and no mitigation measured are required**.

Implementation of the following best management practices would help ensure that potential odors emitted during construction activity would be contained and dispersed to minimize any odor impacts:

- A methodology for phased or staged operations to minimize the amount of sediment stored locally.
- Monitoring with a field olfactometer may occur to establish threshold levels at which additional measures must be incorporated to limit total odors.
- Utilization of lime stabilization (or similar technology) may be used to speed the dewatering process for the sediment layer which contains organic material. Lime enables the contractor to raise the pH level to 12 to contain odors and suppress microbiological decay of the organic material to objectionable gas products. Procurement and local storage of an oxidizing chemical that can be applied in liquid form to treat stored sediment, if needed.
- Displaying signage with the on-site construction supervisor's contact information for area residents to phone in odor complaints.

3.2.3.5 Operational Impacts

AQ-1. Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Criteria for determining consistency for the AQMP are defined in the *CEQA Air Quality Handbook* (SCAQMD 1993). There are two key indicators of consistency:

Consistency Criteria No. 1: ***Whether the project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP*.**

Consistency Criterion No. 1 refers to violations of NAAQS and CAAQS. SCAQMD recommends an air quality modeling analysis be performed to identify Project impacts. In order to be found consistent with Consistency Criterion No. 1, the analysis will need to demonstrate that Project emissions will not increase the frequency or severity of existing violations or cause or contribute to new violations. As discussed above, Project construction (Table 3.2-6 through Table 3.2-8) and operation (Table 3.2-9, and Table 3.2-10) would result in emissions that would not exceed regional and localized thresholds crafted to bring the area into attainment (regional thresholds) and to ensure no violations of NAAQS and CAAQS occur locally (localized thresholds). Therefore, the Project complies with Consistency Criterion No. 1.

Table 3.2-9. Estimate of Regional Operational Emissions (pounds per day)

Operational Element	VOC	NO_X	CO	SO_X	PM10	PM2.5
Area	< 1	<1	<1	<1	<1	<1
Energy	< 1	< 1	< 1	< 1	< 1	< 1
Mobile	< 1	< 1	< 1	< 1	< 1	< 1
Maximum Daily Emissions	**< 1**	**< 1**	**< 1**	**< 1**	**< 1**	**< 1**
SCAQMD Regional Operational Threshold	75	100	550	150	150	55
Exceed Significant Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod modeling by ICF 2016 (Appendix B of this EIR).

Table 3.2-10. Estimate of Localized Operational Emissions (pounds per day)

Operational Element	VOC	NO_X	CO	SO_X	PM10	PM2.5
Area	< 1	< 1	< 1	< 1	< 1	< 1
Energy	< 1	< 1	< 1	< 1	< 1	< 1
Mobile	< 1	< 1	< 1	< 1	< 1	< 1
Maximum Daily Emissions	**< 1**	**< 1**	**< 1**	**< 1**	**< 1**	**< 1**
SCAQMD Localized Operational Threshold	N/A	103	562	N/A	1.0	1.0
Exceed Significant Threshold?	N/A	**No**	**No**	N/A	**No**	**No**

N/A: Not applicable; SCAQMD has no localized significance thresholds for VOC or SO_X
Source: CalEEMod modeling by ICF 2016 (Appendix B of this EIR).

Consistency Criteria No. 2: ***Whether the project will exceed the assumptions in the AQMP or increments based on the year of project build-out and phase.***

SCAQMD is required, pursuant to the CAA, to reduce emissions of criteria pollutants for which the Basin is in nonattainment status. SCAQMD's most recent plan to achieve air quality standards is the 2012 AQMP, adopted by SCAQMD's Governing Board on December 7, 2012. The 2012 AQMP outlines a comprehensive control strategy to meet the requirement for expeditious progress toward

attainment of the 24-hour PM2.5 NAAQS in 2014 through all feasible control measures. The 2012 AQMP also includes specific measures for implementing the O_3 strategy from the 2007 AQMP and attaining the 8-hour ozone standard by 2023 (SCAQMD 2013).

The AQMP strategies are based, in part, on regional population, housing, and employment projections prepared by the region's cities and counties. In essence, if a project is consistent with applicable planning documents, then the project is consistent with the AQMP. The Proposed Project is subject to the City of Los Angeles General Plan. Among the components of the General Plan, the Framework Element discusses the goals, objectives, and policies with respect to wastewater, which include the following:

- Goal 9A: Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.
    - Objective 9.2: Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.
        - Policy 9.2.2: Maintain wastewater treatment capacity commensurate with population and industrial needs.
        - Policy 9.2.4: Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.

The Proposed Project is consistent with the wastewater goals, objectives, and policies identified in the Framework Element of the General Plan. The Bureau of Engineering has programmed the Proposed Project as part of its Wastewater – Collection System Program (City of Los Angeles 2016).

Pursuant to SCAQMD guidelines, because the Project would be consistent with the governing land use document, which is the City's General Plan, the Proposed Project is considered consistent with the region's AQMP. Therefore, the Project complies with Consistency Criterion No. 2. As such, because the Project complies with the applicable plans and associated goals, objectives, and policies, the Project would not increase violations or lead to new violations and Project-related emissions accounted for in the AQMP, developed to bring the Basin into attainment status for all nonattainment pollutants and precursors thereof. Therefore, impacts are considered **less than significant; no mitigation measures are required.**

AQ-2. Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation or expose sensitive receptors to substantial pollutant concentrations?

Once operational, the Proposed Project would result in the long-term generation of criteria pollutant emissions associated with commute trips of employees working at the site, natural gas combustion for space and heating, and area sources associated with consumer products (cleaning supplies, kitchen aerosols, cosmetics, toiletries), architectural coatings, landscaping of the Open Space area, as well as periodic backup generator testing. Operations-related emissions are shown in Table 3.2-7 and indicate that maximum daily Project-related criteria pollutant emissions would not exceed SCAQMD operations-period thresholds for any pollutant. Consequently, the impact of operations-related emissions would be **less than significant; no mitigation measures are required.**

As shown in Table 3.2-8, localized emissions during operations would not exceed the appropriate LSTs for the Project with the implementation of **Mitigation Measure AQ-1**. Consequently, the impact of operations-related localized emissions **would be less than significant; no mitigation measures are required.**

SCAQMD's *CEQA Air Quality Handbook* recommends an evaluation of CO standards when volume-to-capacity (V/C) ratios at affected intersections or roadways are increased by 2 percent or more at intersections with a level of service (LOS) of C or worse (SCAQMD 1993). As noted in the Project Description (see Chapter 2 of this EIR), two employees would be required for Project operation at any given time for a total of 6 employees per 24-hour day. Thus, the 6 regular round trips associated with the Proposed Project would not increase V/C ratios such that an exceedance of CO standards would occur since these would be minor in nature and would not exceed an established traffic threshold. Therefore, the Proposed Project would not cause or contribute to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm) or result in an incremental increase due to the Project is equal to or greater than 1.0 ppm for the California 1-hour CO standard or 0.45 ppm for the 8-hour CO standard. Consequently, the impact of operations-related CO emissions would be **less than significant; no mitigation measures are required.**

As shown in Table 3.2-7, operational emissions of VOC would be less than 1 pound per day, which is below the 10-ton annual threshold as identified in SCAQMD's *CEQA Air Quality Handbook* (SCAQMD 1993).

Emissions of TAC, particularly DPM, would likely be released during Project operation associated with maintenance vehicles and equipment as well as through the emergency use and testing of the diesel-powered backup generator. Maintenance and inspection activities would be conducted on an as-needed basis, assumed to be at least once per year. The generator would serve as back-up power in the event of power loss. Due to the infrequency of maintenance activities and generator use, substantial emissions of TACs are not anticipated and would be short-term in duration. Thus, operational impact emissions would be **less than significant; no mitigation measures are required.**

AQ-3. 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?

As discussed above, the Basin is a federal nonattainment area for ozone, PM2.5, and Pb and state nonattainment area for ozone, PM10, and PM2.5. As shown in Table 3.2-7, emissions of regional pollutants would not exceed SCAQMD thresholds. Given that SCAQMD's thresholds were developed to ensure that impacts at the Project level would not hinder regional attainment, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment. Therefore, regional pollutant emission impacts would be **less than significant; no mitigation measures are required.**

AQ-4. Would the Project expose sensitive receptors to substantial pollutant concentrations?

As shown in Table 3.2-9, operation of the Proposed Project would not result in an exceedance of LSTs such that significant impacts on sensitive receptors would occur. With the exception of the infrequent use of the back-up diesel-powered generator, localized TAC emissions would be minimal during project operation. Therefore, operational impacts related to sensitive receptors would be **less than significant; no mitigation measures are required.**

AQ-5. Would the Project create objectionable odors affecting a substantial number of people?

According to the ARB and SCAQMD's *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting areas, refineries, landfills, dairies, and fiberglass molding facilities. Although the Proposed Project does not treat wastewater, wastewater is pumped at the site within enclosed pipe and associated underground facilities, and thus the Project has the potential to generate odors.

The existing VPP is equipped with an exhaust fan that discharges vapors through an existing stack and field investigation of the ventilation fan shows that the flange that connects the fan to the dispersion stack is displaced, and odors can exit through the gap at the joint. To remedy this, the fan and flanges would be replaced with compatible equipment as a component of the Proposed Project. In addition, a slide gate at the entrance to the VAPP wet well (where the three submersible pumps would be located) from the influent pipe would be installed to deter odors. Any odors in the piping would therefore be confined to that system. When the VAPP is in operation, the head spaces of the wet wells would be linked by the 66-inch sewer, and the exhaust fan would be able to service the entire system. Given that the Proposed Project would eliminate the existing gap between the existing fan and the dispersion stack, nuisance odors from the existing VPP and Proposed Project would improve. Also, because the Proposed Project would replace rental aboveground pumps that have been known to produce odors in the Project vicinity with underground facilities, the Proposed Project would result in an improvement in odors. Furthermore, the Proposed Project adds redundancy and reliability to the system, thereby reducing the risk of emergency discharges of sewage directly into the Grand Canal and Ballona Lagoon or overflows into the surrounding street network during periods of wet weather, which could create objectionable odors.

Based on the elimination of the gap between the fan and the dispersion stack, replacement of temporary aboveground pumps with underground facilities, and the increased reliability to reduce emergency risks, the Proposed Project is expected to result in improvements related to odors. Therefore, operation of the Proposed Project would not create objectionable odors affecting a substantial number of people, and impacts would be **less than significant; no mitigation measures are required.**

3.2.4 Mitigation Measures

The following mitigation measure would be implemented to reduce impacts related to the construction-period of the PM10 LST. With the implementation of mitigation, impacts would be less than significant.

MM AQ-1. Tier 3 construction equipment. All off-road diesel-powered construction equipment greater than 50 horsepower will meet Tier 3 emission standards. All construction equipment will be outfitted with ARB best available control technology devices. Any emissions-control device used by the contractor will achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations. A copy of each unit's certified tier specification, best available control technology documentation, and ARB or SCAQMD operating permit will be provided at the time of mobilization of each applicable unit of equipment.

3.2.5 Significant Unavoidable Adverse Impacts

There would be no significant unavoidable adverse impacts related to air quality.

3.2.6 Cumulative Impacts

Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. The study area for cumulative effects on localized air quality is the area within 0.5 mile of the Project Site, and the study area for regional air pollutants is the Basin. The Project vicinity experiences exceedances of state and federal ambient air quality standards as a consequence of past and present projects and is subject to continued nonattainment status by reasonably foreseeable future projects.

Construction of the projects identified in the related projects list in Chapter 1, Introduction (see Table 1-1 of this EIR) could overlap with the construction of the Proposed Project. In this case, emissions would occur concurrently with those resulting from construction of the Proposed Project. Given that each of the projects will be required to mitigate its impacts and comply with Rule 403, impacts would not be cumulatively considerable and would not conflict with or obstruct implementation of SCAQMD's AQMP.

Operation of the Proposed Project could coincide with construction or operation of the projects identified in Chapter 1. With the exception of the Via Dolce Park and the Marina Beach General Improvements projects, all related projects are infrastructure projects that would not generate vehicle trips. The Via Dolce Park and the Marina Beach General Improvements projects are not expected to result in substantial trip generation; the Via Dolce Park would be small and generally used by local residents within walking distance of the park and the Marina Beach project would represent marginal improvements that would attract a minimal number of new trips to the Project area. Given the importance of vehicle emissions in overall emissions of projects, the Proposed Project in combination with related projects are not expected to result in cumulatively considerable increase in pollutant emissions and would not conflict with or obstruct implementation of SCAQMD's AQMP

SCAQMD has prepared, and periodically updates, the Basin's regional AQMP that sets forth a comprehensive and integrated program that will lead the Basin into compliance with the federal and state air quality standards. The Proposed Project would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants.[2] Furthermore, construction-period emissions would be below SCAQMD regional and localized thresholds during construction

[2] CEQA Guidelines Section 15064(h)(3) states "A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project."

with the implementation of **Mitigation Measure AQ-1** (see Table 3.2-6 through Table 3.2-8) while operational emissions would be below SCAQMD regional and localized operational thresholds (see Table 3.2-9 and Table 3.2-10). The Proposed Project would comply with SCAQMD rules and regulations, including Rule 403 (Fugitive Dust Control) and Rule 1108 (Cutback Asphalt), during construction as well as all other adopted AQMP emissions control measures to minimize emissions and impacts on nearby sensitive receptors.

Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on all projects Basin-wide, including all nearby projects. For the reasons identified above (Project consistency with the AQMP, less-than-significant Project emissions, compliance with SCAQMD Rules, and the CEQA requirement that related projects mitigate impacts), Project emissions would not be cumulatively considerable during short-term construction or long-term operations.