

# Air Quality & Greenhouse Gas Emissions Quantification Report

September 2018

## DAY STREET FAMILY APARTMENTS

(NEC Alessandro Boulevard and Day Street, Moreno Valley, CA)



Prepared By:



Milan L. Garrison, President  
Maxsum Development, LLC  
3016 E. Colorado Boulevard, Suite 5626  
Pasadena, California 91117  
626. 422. 0351 office  
626. 664. 5003 mobile

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## **APPENDICES**

Appendix A: California Emissions Estimator Model, version 2016.3.1 Output Files - Criteria Pollutant Emissions

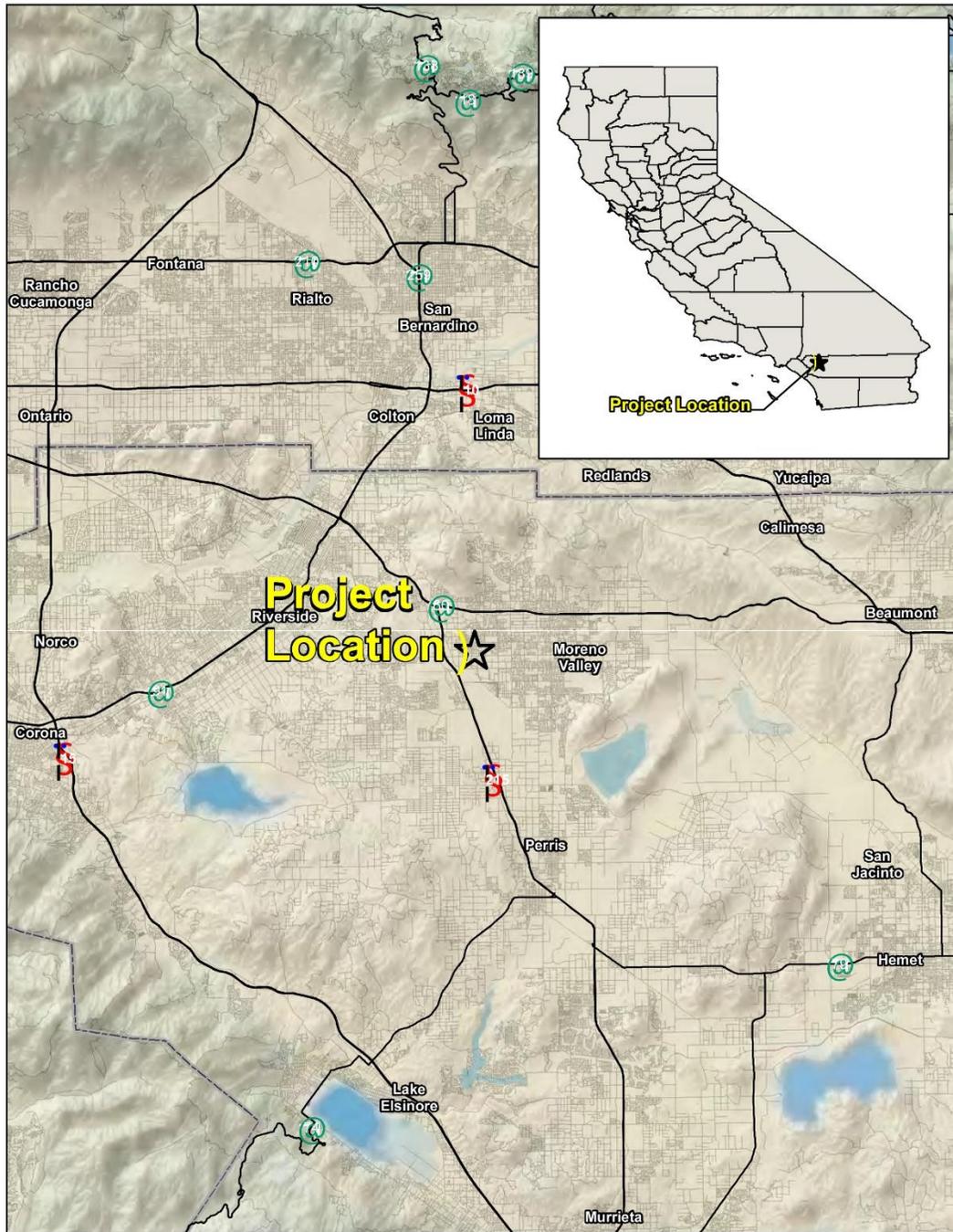


This technical report has been prepared to support the “**Day Street Family Apartments**” (project) environmental review process and provide information regarding potential impacts to air quality and greenhouse gas emissions associated with the approval of the proposed project. The proposed project is to construct 199 affordable units within three (3) stories (36 feet in height) to include four (4) family apartment buildings, two (2) senior apartment buildings, one (1) community building, two laundry buildings, one (1) pool and one (1) tot lot on the existing vacant land area. The unit mix includes 1, 2, and 3-bedroom apartments ranging in size from 627 square feet to 1,002 square feet. The Project also includes 334 vehicular on-site parking spaces whereby 330 spaces are required. The development will total 77,748 square feet of gross building area on a net lot area of 317,988 square feet (7.3 acres) located at the northeast corner of Alessandro Boulevard and Day Street in the R-30 zone with a consistent underlying General Plan Land Use designation of Multiple Family Residential (Max 30d/ac). Vehicular access will be provided via two project driveways. A full access ingress/egress on Day Street and the second driveway on Alessandro Boulevard providing right in/out only. This report describes the existing air quality in the project area and evaluates potential short- and long-term air quality impacts associated with development of the project.

### 1.1 PROJECT LOCATION

The project site lies within the southwest portion of the City of Moreno Valley, Riverside County, California. The City of Moreno Valley is located north of the City of Perris, northwest of the City of Hemet, west of the City of Beaumont, east/southeast of the City of Riverside, and east of the unincorporated communities of Mead Valley and Woodcrest. As shown on Exhibit A, *Regional Location Map*, the Project Site is approximately 1.5 miles east of the Interstate 215 (I-215), and approximately 1.8 miles south of State Route 60 (SR-60). Locally, the Project site is situated at the northeast corner of Alessandro Boulevard and Day Street. Sherman Avenue borders the site to the north and Pepper Street on the east (see Exhibit B, *Vicinity Map*). The Project site includes Assessor Parcel Number (APN) 291-191-007 through 013 and 025 through 029.

Exhibit A – Regional Location Map

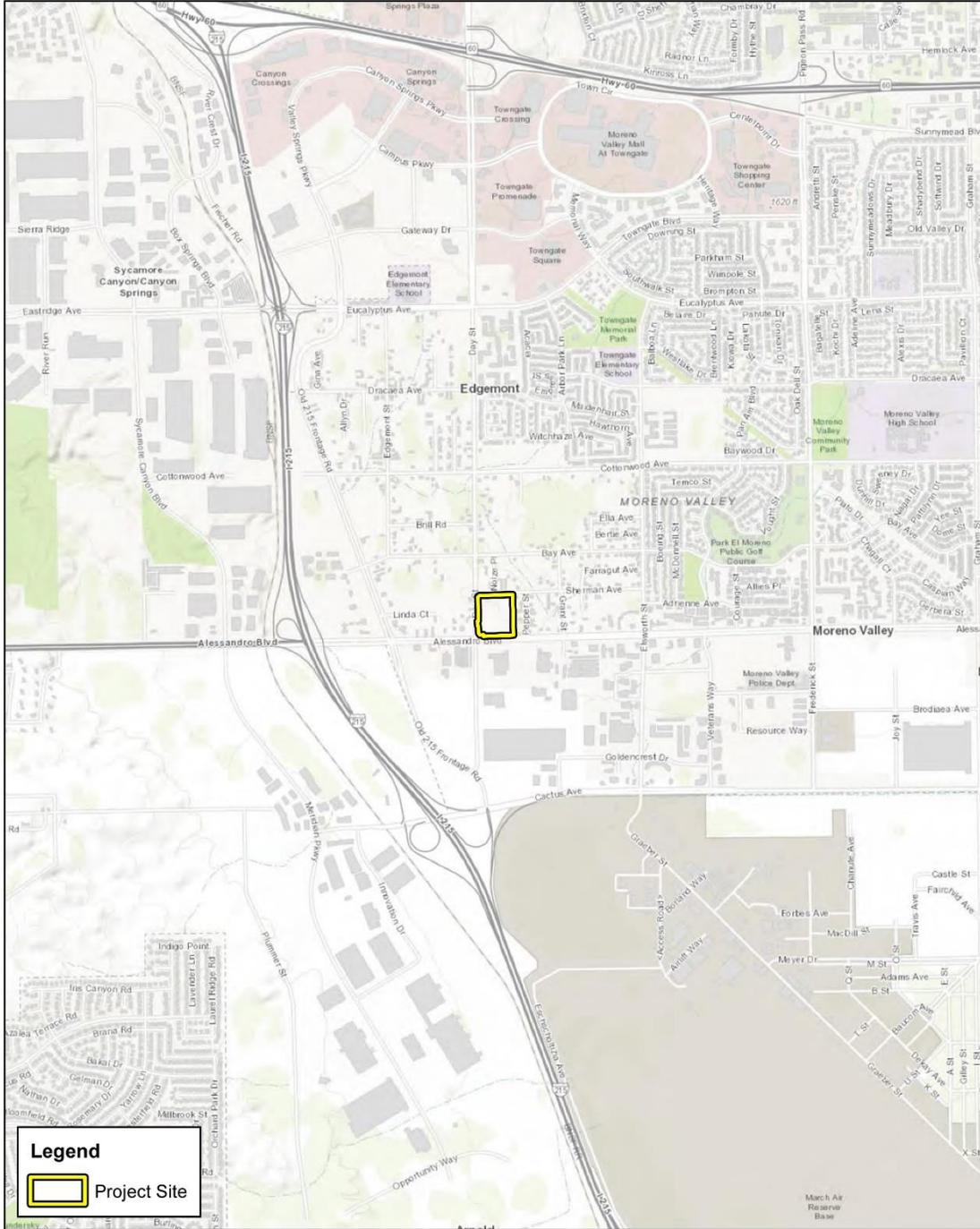


ALESSANDRO BOULEVARD AND DAY STREET PROJECT

Regional Location Map

Figure A-1

Exhibit B – Vicinity Map



ALESSANDRO BOULEVARD AND DAY STREET PROJECT



Source: Riverside County, USGS Contours, ESRI World Topo Basemap

Site Vicinity

Figure A-2

## 1.0 INTRODUCTION

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### 1.2 PROJECT DESCRIPTION

The proposed project is to construct 199 affordable units within three (3) stories (36 feet in height) to include four (4) family apartment buildings, two (2) senior apartment buildings, one (1) community building, two laundry buildings, one (1) pool and one (1) tot lot on the existing vacant land area. The unit mix includes 1, 2, and 3-bedroom apartments ranging in size from 627 square feet to 1,002 square feet. The Project also includes 334 vehicular on-site parking spaces whereby 330 spaces are required. The development will total 77,748 square feet of gross building area on a net lot area of 317,988 square feet (7.3 acres) located at the northeast corner of Alessandro Boulevard and Day Street in the R-30 zone with a consistent underlying General Plan Land Use designation of Multiple Family Residential (Max 30d/ac). Vehicular access will be provided via two project driveways. A full access ingress/egress on Day Street and the second driveway on Alessandro Boulevard providing right in/out only.

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### 2.0 ENVIRONMENTAL SETTING

#### 2.1 CLIMATE AND METEOROLOGY

The project site is located in the City of Moreno Valley, Riverside County, which lies within the South Coast Air Basin (SoCAB). The project area is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SoCAB is a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The air basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties and all of Orange County. The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

Atmospheric conditions such as wind speed, wind direction, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The topography and climate of Southern California combine to make the SoCAB an area of high air pollution potential. The air basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains on the rest of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is disrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. Light winds during the summer further limit ventilation. In addition, sunlight triggers the photochemical reactions that produce ozone.

Based on climate records from the Western Regional Climate Center (2016), the average annual maximum temperature in the city is 74 degrees Fahrenheit (°F) and the average annual minimum temperature is 56°F. The average precipitation in Moreno Valley is about 15 inches annually, occurring primarily from December through March.

#### 2.2 CRITERIA AIR POLLUTANTS OF CONCERN

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. These regulated air pollutants are known as criteria air pollutants and are categorized into primary and secondary pollutants. Primary air pollutants are those that are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), most particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), lead, and fugitive dust are primary air pollutants. Of these, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are criteria pollutants. ROG and NO<sub>x</sub> are criteria pollutant precursors and go on to form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O<sub>3</sub>) and nitrogen dioxide (NO<sub>2</sub>) are the principal secondary pollutants. Presented below is a description of each of the primary and secondary criteria air pollutants and their known health effects.

*Carbon monoxide* (CO) is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. The primary adverse health effect associated

## 2.0 ENVIRONMENTAL SETTING

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with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation.

*Reactive organic gases (ROG)* are compounds comprising primarily atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Other sources of ROG include evaporative emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. Adverse effects on human health are not caused directly by ROG, but rather by reactions of ROG to form secondary pollutants such as ozone.

*Nitrogen oxides (NO<sub>x</sub>)* serve as integral participants in the process of photochemical smog production. NO<sub>x</sub> acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens. The two major forms of NO<sub>x</sub> are nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>). NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure.

*Nitrogen dioxide (NO<sub>2</sub>)*, a reddish-brown irritating gas, is a byproduct of fuel combustion, produced by a combination of NO and oxygen. NO<sub>2</sub> acts as an acute irritant and, in equal concentrations, is more injurious than NO. At atmospheric concentrations, however, NO<sub>2</sub> is only potentially irritating. There is some indication of a relationship between NO<sub>2</sub> and chronic pulmonary fibrosis. Some increase in bronchitis in children has also been observed at concentrations below 0.3 parts per million (ppm). NO<sub>2</sub> absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO<sub>2</sub> also contributes to the formation of PM<sub>10</sub> (see below) and ozone.

*Sulfur dioxide (SO<sub>2</sub>)* belongs to the family of sulfur oxide gases (SO<sub>x</sub>). SO<sub>2</sub> is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. Fuel combustion is the primary source of SO<sub>2</sub>. At sufficiently high concentrations, SO<sub>2</sub> may irritate the upper respiratory tract. At lower concentrations and when combined with particulates, SO<sub>2</sub> may do greater harm by injuring lung tissue. A primary source of SO<sub>2</sub> emissions is high sulfur content coal. Gasoline and natural gas have very low sulfur content and hence do not release significant quantities of SO<sub>2</sub>. Sulfur dioxide is a precursor to sulfate (SO<sub>4</sub>), which is a component of particulate matter. In addition, SO<sub>2</sub> and NO<sub>2</sub> can react with other substances in the air to form acids, which fall to the earth as rain, fog, snow, or dry particles.

*Particulate matter (PM)* is a mixture of pollutants in liquid and solid forms. Particulate matter may be classified as primary or secondary. Primary particulates are emitted directly by emission sources, whereas secondary particulates are formed through atmospheric reaction of gases. Particulates are usually classified according to size. The particle diameter can vary from approximately 0.005 micron to 100 microns. Particulate matter less than 10 microns in diameter is referred to as PM<sub>10</sub> (coarse particulates) and less than 2.5 microns is referred to as PM<sub>2.5</sub> (fine particulates).

*Ozone (O<sub>3</sub>)*, or smog, is one of a number of substances called photochemical oxidants that are formed when ROG and NO<sub>x</sub> (both byproducts of the internal combustion engine) react with sunlight. O<sub>3</sub> is present in relatively high concentrations in the Los Angeles region, and the damaging effects of photochemical smog are generally related to the concentrations of O<sub>3</sub>. Ozone poses a health threat, especially to those who already suffer from respiratory diseases. Additionally, O<sub>3</sub> has been tied to crop damage, typically in the form of stunted growth and premature death. Ozone can also act as a corrosive, resulting in property damage such as the degradation of rubber products.

2.3 AMBIENT AIR QUALITY STANDARDS

Regulation of air pollution is achieved through both federal and state ambient air quality standards and emission limits for individual sources of air pollutants. Ambient air quality standards have been promulgated at the local, state, and federal levels for criteria pollutants. In addition, both the state and federal governments regulate the release of toxic air contaminants (TACs). Because Los Angeles is in the SoCAB, it is subject to the rules and regulations imposed by the SCAQMD and to the ambient air quality standards adopted by the California Air Resources Board (CARB) and the federal government.

The state of California has established health-based ambient air quality standards for 11 air pollutants. As shown in **Table 1**, these pollutants include O<sub>3</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, sulfates, lead, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

**TABLE 1  
AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards
Ozone (O <sub>3</sub> )	8 Hour	0.070 ppm (137µg/m <sup>3</sup> )
	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )
	1 Hour	20 ppm (23 mg/m <sup>3</sup> )
Nitrogen Dioxide (NO <sub>2</sub> )	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )
Sulfur Dioxide (SO <sub>2</sub> )	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )
	3 Hour	—
	1 Hour	0.25 ppm (665 µg/m <sup>3</sup> )
Particulate Matter (PM <sub>10</sub> )	Annual Arithmetic Mean	20 µg/m <sup>3</sup>
	24 Hour	50 µg/m <sup>3</sup>
Particulate Matter – Fine (PM <sub>2.5</sub> )	Annual Arithmetic Mean	12 µg/m <sup>3</sup>
	24 Hour	N/A
Sulfates	24 Hour	25 µg/m <sup>3</sup>
Lead	Calendar Quarter	N/A
	30 Day Average	1.5 µg/m <sup>3</sup> )
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )
Vinyl Chloride (chloroethene)	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )
Visibility-Reducing Particles	8 Hour (10:00 to 18:00 PST)	—

Source: CARB 2016

Notes: mg/m<sup>3</sup>=milligrams per cubic meter; ppm=parts per million; ppb=parts per billion; µg/m<sup>3</sup>=micrograms per cubic meter

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As previously stated, O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are the most important pollutants affecting the SoCAB. **Table 2** shows the state attainment status for the SoCAB and thus for Los Angeles. Areas with air quality that exceed adopted air quality standards are designated as nonattainment areas for the relevant air pollutants. Areas that comply with air quality standards are designated as attainment areas for the relevant air pollutants. "Unclassified" is used in areas that cannot be classified on the basis of available information as meeting or not meeting the standards. The region is nonattainment for state ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards (CARB 2016).

**TABLE 2**  
**ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN**

<b>Pollutant</b>	<b>State Designation</b>	<b>Federal Designation</b>
O <sub>3</sub>	Nonattainment	Nonattainment
PM <sub>10</sub>	Nonattainment	Nonattainment
PM <sub>2.5</sub>	Nonattainment	Nonattainment
CO	Attainment	Unclassified/Attainment
NO <sub>2</sub>	Attainment	Unclassified/Attainment
SO <sub>2</sub>	Attainment	Attainment
Lead	Attainment	Attainment

Source: CARB 2016

### 2.4 TOXIC AIR CONTAMINANTS

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

There are many different types of TACs with varying degrees of toxicity. Sources of TACs include industrial processes such as petroleum refining and chrome-plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Public exposure to TACs can result from emissions from normal operations, as well as from accidental releases of hazardous materials during upset conditions. The health effects of TACs include cancer, birth defects, neurological damage, and death.

To date, CARB has designated nearly 200 compounds as TACs. Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to a relatively few compounds, one of the most important in Southern California being particulate matter from diesel-fueled engines. In 1998, CARB identified particulate emissions from diesel-fueled engines (diesel PM) as TACs. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

In 2008, the SCAQMD updated the study on ambient concentrations of TACs and estimated the potential health risks from air toxics. The results showed that the overall risk for excess cancer from a lifetime exposure to ambient levels of air toxics was about 1,200 in a million. The largest contributor to this risk was diesel exhaust, accounting for 84 percent of the air toxics risk (SCAQMD 2008).

**Land Use Compatibility with TAC Emission Sources**

The location of a development project is a major factor in determining whether it will result in localized air quality impacts. The potential for adverse air quality impacts increases as the distance between the source of emissions and members of the public decreases. While impacts on all members of the population should be considered, impacts on sensitive receptors, such as schools or hospitals, are of particular concern. In 2005, CARB published an informational guide entitled *Air Quality and Land Use Handbook: A Community Health Perspective*. The guide provides information to aid local jurisdictions in addressing issues and concerns related to the placement of sensitive land uses near major sources of air pollution. The handbook includes recommended separation distances for various land uses, summarized in **Table 3**. However, these recommendations are not site-specific and should not be interpreted as mandated “buffer zones.” It is also important to note that the recommendations of the handbook are advisory and need to be balanced with other state and local policies (CARB 2005).

**TABLE 3  
RECOMMENDATIONS ON SITING NEW SENSITIVE LAND USES NEAR AIR POLLUTANT SOURCES**

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	<ul style="list-style-type: none"> <li>• Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.</li> </ul>
Distribution Centers	<ul style="list-style-type: none"> <li>• Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week).</li> <li>• Take into account the configuration of existing distribution centers, and avoid locating residences and other new sensitive land uses near entry and exit points.</li> </ul>
Rail Yards	<ul style="list-style-type: none"> <li>• Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard.</li> <li>• Within 1 mile of a rail yard, consider possible siting limitations and mitigation.</li> </ul>
Ports	<ul style="list-style-type: none"> <li>• Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or CARB on the status of pending analyses of health risks.</li> </ul>
Refineries	<ul style="list-style-type: none"> <li>• Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.</li> </ul>
Chrome Platers	<ul style="list-style-type: none"> <li>• Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.</li> </ul>
Dry Cleaners Using Perchloroethylene	<ul style="list-style-type: none"> <li>• Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with three or more machines, consult with the local air district.</li> <li>• Do not site new sensitive land uses in the same building with perchloroethylene dry cleaners.</li> </ul>

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Source Category	Advisory Recommendations
Gasoline Dispensing Facilities	<ul style="list-style-type: none"> <li>Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas-dispensing facilities.</li> </ul>

Source: CARB 2005

Note: Recommendations are advisory, are not site-specific, and may not fully account for future reductions in emissions, including those resulting from compliance with existing/future regulatory requirements, such as reductions in diesel-exhaust emissions anticipated to occur with continued implementation of CARB's Diesel Risk Reduction Plan.

### Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others because of the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are considered to be sensitive receptors to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. The residential uses to the east, west and south of the proposed project site would be considered sensitive receptors.

### 2.5 AMBIENT AIR QUALITY

The SCAQMD maintains monitoring stations within district boundaries that monitor air quality and compliance with associated ambient standards. The project site is in Los Angeles, and the nearest air quality monitoring station is the Los Angeles North Main Street station (1630 North Main Street), located approximately 40 miles east of the project site. Air quality in the project area can be characterized by ambient air quality data collected at this monitoring station. The station currently only monitors the ambient concentrations of ozone, CO, NO<sub>2</sub>, and PM<sub>2.5</sub>. Historical data from the Los Angeles Station for the three most recent years (2012–2014) is shown in **Table 4**.

**TABLE 4**  
**SUMMARY OF AMBIENT AIR QUALITY DATA – NORTH MAIN STREET STATION**

Pollutant Standards	2012	2013	2014
<b>Ozone</b>			
Max 1-hour concentration (ppm)	0.093	0.081	0.113
Max 8-hour concentration (ppm)	0.077	0.069	0.094
Number of days above state 1-hour standard	0	0	3
Number of days above state/federal 8-hour standard	1/2	0/0	2/7
<b>Carbon Monoxide (CO)</b>			
Highest 8-hour average (ppm)	1.91	*	*
Number of days above state standard	0	0	0

Pollutant Standards	2012	2013	2014
Number of days above national standard	0	0	0
<b>Nitrogen Dioxide (NO<sub>2</sub>)</b>			
Highest 1-hour average (ppm)	77	90	82
Number of days above state standard	0	0	0
Number of days above national standard	0	0	0
<b>Fine Particulate Matter (PM<sub>2.5</sub>)</b>			
Max 24-hour concentration (µg/m <sup>3</sup> )	58.7	43.1	59.9
Number of days above federal standard	4	1	6
<b>Respirable Particulate Matter (PM<sub>10</sub>)</b>			
Max 24-hour concentration (µg/m <sup>3</sup> )	90.9	74.5	86.8
Number of days above federal standard	0	0	0
Number of days above state standard	43	20	38

Source: CARB 2016

Notes: µg/m<sup>3</sup> = micrograms per cubic meter; ppm = parts per million

\* No data currently available to determine the value

## 2.6 GREENHOUSE GAS EMISSION

Since the early 1990s, scientific consensus holds that the world's population is releasing greenhouse gases (GHGs) faster than the earth's natural systems can absorb them. These gases are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. This release of gases, such as carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O), creates a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of GHGs beyond natural levels. The overabundance of GHGs in the atmosphere has led to a warming of the earth and has the potential to severely impact the earth's climate system.

While often used interchangeably, there is a difference between the terms *climate change* and *global warming*. According to the National Academy of Sciences, climate change refers to any significant, measurable change of climate lasting for an extended period of time that can be caused by both natural factors and human activities. Global warming, on the other hand, is an average increase in the temperature of the atmosphere caused by increased GHG emissions. Use of the term *climate change* is becoming more prevalent because it encompasses all changes to the climate, not just temperature.

To fully understand global climate change, it is important to recognize the naturally occurring greenhouse effect and to define the GHGs that contribute to this phenomenon. Various gases in the earth's atmosphere, classified as atmospheric GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space and a portion of the radiation is absorbed by the earth's surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that would have otherwise escaped back

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into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect.

Among the prominent GHGs contributing to the greenhouse effect are CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. **Table 5** provides descriptions of the primary GHGs attributed to global climate change, including a description of their physical properties, primary sources, and contribution to the greenhouse effect.

**TABLE 5  
GREENHOUSE GASES**

Greenhouse Gas	Description
Carbon Dioxide (CO <sub>2</sub> )	Carbon dioxide is a colorless, odorless gas. CO <sub>2</sub> is emitted in a number of ways, both naturally and through human activities. The largest source of CO <sub>2</sub> emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, industrial facilities, and other sources. A number of specialized industrial production processes and product uses such as mineral production, metal production, and the use of petroleum-based products can also lead to CO <sub>2</sub> emissions. The atmospheric lifetime of CO <sub>2</sub> is variable because it is so readily exchanged in the atmosphere. <sup>1</sup>
Methane (CH <sub>4</sub> )	Methane is a colorless, odorless gas and is the major component of natural gas, about 87 percent by volume. It is also formed and released to the atmosphere by biological processes occurring in anaerobic environments. Methane is emitted from a variety of both human-related and natural sources. Human-related sources include fossil fuel production, animal husbandry (intestinal fermentation in livestock and manure management), rice cultivation, biomass burning, and waste management. These activities release significant quantities of CH <sub>4</sub> to the atmosphere. Natural sources of CH <sub>4</sub> include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and other sources such as wildfires. The atmospheric lifetime of CH <sub>4</sub> is about 12 years. <sup>2</sup>
Nitrous Oxide (N <sub>2</sub> O)	Nitrous oxide is a clear, colorless gas with a slightly sweet odor. Nitrous oxide is produced by both natural and human-related sources. Primary human-related sources of N <sub>2</sub> O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. Nitrous oxide is also produced naturally from a wide variety of biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N <sub>2</sub> O is approximately 120 years. <sup>3</sup>

Sources: <sup>1</sup> EPA 2015a, <sup>2</sup> 2015b, <sup>3</sup> 2015c

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Methane traps over 25 times more heat per molecule than CO<sub>2</sub>, and N<sub>2</sub>O absorbs 298 times more heat per molecule than CO<sub>2</sub>. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO<sub>2</sub>e), which weigh each gas by its global warming potential (GWP). Expressing GHG emissions in CO<sub>2</sub>e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO<sub>2</sub> were being emitted.

As the name implies, global climate change is a global problem. Greenhouse gases are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern, respectively. According to CARB, California is a significant emitter of CO<sub>2</sub>e in the world and produced 459 million gross metric tons of CO<sub>2</sub>e in 2012. Consumption of fossil fuels in the transportation sector was the single largest source of California's GHG emissions in 2010, accounting for 36 percent of total GHG emissions in the state. This category was followed by the

electric power sector (including both in-state and out-of-state sources) (21 percent) and the industrial sector (19 percent). (CARB 2014)

### 3.0 RULES AND REGULATIONS

#### 3.1 CRITERIA AIR POLLUTANT REGULATIONS

Development associated with the proposed project has the ability to release gaseous emissions of criteria pollutants and dust into the ambient air; therefore, the project falls under the ambient air quality standards promulgated on the local, state, and federal levels. The federal Clean Air Act of 1971 and the Clean Air Act Amendments (1977) established the national ambient air quality standards, which are promulgated by the US Environmental Protection Agency (EPA). The state of California has also adopted its own California ambient air quality standards, which are promulgated by CARB. Los Angeles is in the SoCAB, which is under the air quality regulatory jurisdiction of the SCAQMD and is subject to the rules and regulations adopted by the SCAQMD to achieve attainment with the national and state ambient air quality standards.

California has adopted various administrative initiatives and pieces of legislation relating to climate change, much of which set aggressive goals for GHG emissions reductions in the state. Although lead agencies must evaluate climate change and GHG emissions of projects subject to the California Environmental Quality Act (CEQA), the CEQA Guidelines do not require or suggest specific methodologies for performing an assessment or specific thresholds of significance and do not specify GHG reduction mitigation measures. Instead, the guidelines allow lead agencies to choose methodologies and make significance determinations based on substantial evidence, as discussed in further detail below. In addition, no state agency has promulgated binding regulations for analyzing GHG emissions, determining their significance, or mitigating significant effects in CEQA documents. Thus, lead agencies exercise their discretion in determining how to analyze GHGs.

#### STATE

#### **California Global Warming Solutions Act (Assembly Bill 32)**

One of the primary acts driving GHG regulation and analysis in California is the California Global Warming Solutions Act of 2006 (AB 32) (Health and Safety Code Sections 38500, 38501, 28510, 38530, 38550, 38560, 38561–38565, 38570, 38571, 38574, 38580, 38590, 38592–38599), which instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. The act directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020.

#### AB 32 Scoping Plan

CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business as usual"). The Scoping Plan evaluates opportunities for sector-specific reductions; integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities; identifies additional measures to be pursued as regulations; and outlines the role of a cap-and-trade program. Additional

development of these measures and adoption of the appropriate regulations occurred through the end of year 2013. Key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent.
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system, and caps sources contributing 85 percent of California's GHG emissions.
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets.
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, heavy-duty truck measures, and the Low Carbon Fuel Standard.
- Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the state of California's long-term commitment to AB 32 implementation. (CARB 2008)

In 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relies on emissions projections updated in light of current economic forecasts that account for the economic downturn since 2008, reduction measures already approved and put in place relating to future fuel and energy demand, and other factors. This reduced the projected 2020 emissions from 596 million metric tons (MMT) CO<sub>2</sub>e to 545 MMTCO<sub>2</sub>e. The reduction in projected 2020 emissions means that the revised business-as-usual reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now 21.7 percent. CARB also provided a lower 2020 inventory forecast that incorporated state-led GHG emissions reduction measures already in place. When this lower forecast is considered, the necessary reduction from business-as-usual needed to achieve the goals of AB 32 is approximately 16 percent.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan summarizes the most recent science related to climate change, including anticipated impacts to California and the levels of GHG emissions reduction necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The Scoping Plan update also looks beyond 2020 toward the 2050 goal established in Executive Order S-3-05, though not yet adopted as state law, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal." The Scoping Plan update does not establish or propose any specific post-2020 goals, but identifies such goals adopted by other governments or recommended by various scientific and policy organizations. Executive Order B-30-15 (signed April 29, 2015) endorses the effort to set interim GHG reduction targets for year 2030 (40 percent below 1990 levels).

## 3.0 RULES AND REGULATIONS

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### California Executive Orders

Two executive orders—California Executive Order 5-03-05 (2005) and California Executive Order B-30-15 (2015)—highlight GHG emissions reduction targets, though such targets have not been adopted by the state and remain only a goal of the executive orders. Specifically, Executive Order 5-03-05 seeks to achieve a reduction of GHG emissions of 80 percent below 1990 levels by 2050 and Executive Order B-30-15 seeks to achieve a reduction of GHG emissions of 40 percent below 1990 levels by 2030. Technically, a governor's executive order does not have the effect of new law but can only reinforce existing laws. For instance, as a result of the AB 32 legislation, the state's 2020 reduction target is backed by the adopted AB 32 Scoping Plan, which provides a specific regulatory framework of requirements for achieving the 2020 reduction target.

### LOCAL

#### South Coast Air Quality Management District

The SCAQMD is the air pollution control agency for Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that the federal and state ambient air quality standards are attained and maintained in the SoCAB. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

#### South Coast Air Quality Management District Rules and Regulations

The following is a list of noteworthy SCAQMD rules that are required of construction activities associated with the proposed project:

- **Rule 402 (Nuisance)** – This rule prohibits the 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. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM<sub>10</sub> emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM<sub>10</sub> suppression techniques are summarized below.
  - a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
  - b) All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.

- c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
  - d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
  - e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.
- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

### Toxic Air Contaminant Regulations

In 1983, the California legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The Health and Safety Code defines a TAC as “an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health.” A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal Clean Air Act (42 United States Code Section 7412[b]) is a toxic air contaminant. Under state law, the California Environmental Protection Agency, acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or to an increase in serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics “Hot Spot” Information and Assessment Act of 1987). The Tanner Air Toxics Act sets forth a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an airborne toxics control measure for sources that emit designated TACs. If there is a safe threshold for a substance (a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology to minimize emissions. CARB has, to date, established formal control measures for 11 TACs, all of which are identified as having no safe threshold.

Air toxics from stationary sources are also regulated in California under the Air Toxics “Hot Spot” Information and Assessment Act of 1987. Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required to perform a health risk assessment and, if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

CARB has designated 244 compounds as TACs. Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines.

## **3.0 RULES AND REGULATIONS**

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### 3.2 GREENHOUSE GAS REGULATIONS

#### LOCAL

#### **South Coast Air Quality Management District**

To provide guidance to local lead agencies on determining significance for GHG emissions in CEQA documents, SCAQMD staff is convening an ongoing GHG CEQA Significance Threshold Working Group. Members of the working group include government agencies implementing CEQA and representatives from various stakeholder groups that provide input to SCAQMD staff on developing the significance thresholds. On October 8, 2008, the SCAQMD released the Draft SCAQMD Staff CEQA GHG Significance Thresholds. These thresholds have not been finalized and continue to be developed through the working group. On September 28, 2010, SCAQMD Working Group Meeting #15 provided further guidance, including an interim screening level threshold of 4.8 metric tons of CO<sub>2</sub>e per service population (residents plus employees) per year in 2020 and 3.0 metric tons of CO<sub>2</sub>e per service population per year in 2035. The SCAQMD has not announced when staff is expecting to present a finalized version of these thresholds to the governing board. The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG reductions; however, these rules are currently applicable only to boilers and process heaters, forestry, and manure management projects.

### 4.0 PROJECT EMISSIONS

#### 4.1 METHODOLOGY

##### **Criteria Pollutants**

This technical report focuses on the nature and magnitude of the change in the air quality environment due to implementation of the project. Air pollutant emissions associated with the project would result primarily from construction activities, including demolition and new construction that would generate air pollutant emissions at the project site and on roadways resulting from construction-related traffic. To a lesser degree, operation of the new hotel and retail uses at the project site and associated traffic volumes generated by these new uses would also result in air pollutant emissions. The emissions generated by these activities and other secondary sources have been estimated and compared to the applicable thresholds of significance recommended by the SCAQMD and are described in more detail below.

Emissions were calculated using California Emissions Estimator Model, version 2016.3.1 is a statewide land use emissions computer model designed to provide a uniform platform for the use of government agencies, land use planners, and environmental professionals. This model was developed in coordination with the SCAQMD and is the most current emissions model approved for use in California by various other air districts.

##### Construction Impacts

Emissions for the construction activities were calculated using California Emissions Estimator Model, version 2016.3.1. Equipment for each phase of construction activity was based on data provided by the project applicant. Detailed assumptions and California Emissions Estimator Model, version 2016.3.1 inputs and outputs are included in **Appendix A**.

In addition to the project's regional pollutant emissions generated during construction, the local effects of the project's pollutant emissions on nearby sensitive receptors were analyzed. To determine whether or not construction activities associated with the proposed project would create significant adverse localized air quality impacts on nearby sensitive receptors, the worst-case daily emissions contribution from the project were evaluated against the SCAQMD's localized significance thresholds (LSTs). LSTs represent the daily 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 thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of the subject pollutant for each of the 38 source receptor areas (SRAs) in the SoCAB. The City of Los Angeles is in SRA 2. The LSTs developed by the SCAQMD are based on the pounds of emissions per day that can be generated by a project without causing or contributing to adverse localized air quality impacts. The analysis of localized air quality impacts focuses only on on-site activities of a project and does not include emissions that are generated off-site such as from haul or delivery truck trips.

For the purpose of analyzing localized air quality impacts, the SCAQMD has developed LSTs for five project site sizes: 1 acre, 2 acres, 3 acres, 4 acres, and 5 acres. The LSTs established for each of the five site acreages represent the amount of pollutant emissions that would not exceed the most stringent applicable federal or state ambient air quality standards. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Given that the project site is 0.55 acres, the LSTs for a 1-acre site were used to determine whether localized air

## 4.0 PROJECT EMISSIONS

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quality impacts on nearby sensitive receptors would result from the project's construction emissions. It should be noted that the closest sensitive receptor are the residential uses located approximately adjacent to the project site to the east and west. Therefore, a distance of 25 meters is utilized in this analysis. Where it is determined that the project's emissions would not exceed the LSTs for a 1-acre site, it can be concluded that no adverse localized air quality impacts would result during project construction.

### Operational Impacts

Implementation of the proposed project would result in the development of eighty (80) residential units with 14,780 square feet of retail commercial space and 126 parking on-site parking spaces. Operational emissions would occur from stationary (area sources) and mobile sources. As such, the net increase in long-term (i.e., operational) regional emissions of criteria air pollutants and precursors associated with the project, including mobile- and area-source emissions, were quantified using the California Emissions Estimator Model, version 2016.3.1. computer model. Area-source emissions, which are widely distributed and made up of many small emissions sources (e.g., building heating and cooling units, landscaping equipment, consumer products, painting operations), were calculated using California Emissions Estimator Model, version 2016.3.1 model defaults based on the size and type of land use proposed. Mobile emission were estimated using the trip generation rates provided in the traffic study for the proposed project.

### Greenhouse Gas Impacts

Project-related GHG emissions would include emissions from direct and indirect sources. The proposed project would result in direct and indirect emissions of CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions. See **Appendix A**.

## 4.2 THRESHOLDS OF SIGNIFICANCE

### **Criteria Pollutants**

Based on the CEQA Guidelines, a project would have a significant adverse effect on air quality resources if it would:

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors to substantial pollutant concentrations.
- Create objectionable odors affecting a substantial number of people.

The SCAQMD developed the CEQA Air Quality Handbook (1993), which establishes suggested significance thresholds based on the volume of pollution emitted. According to the handbook, any project in the SoCAB with daily emissions that exceed any of the following thresholds as shown in **Table 6** should be considered as having an individually and cumulatively significant air quality impact.

**TABLE 6  
SCAQMD REGIONAL THRESHOLDS OF SIGNIFICANCE**

<b>Mass Daily Thresholds (Pounds per Day)</b>		
<b>Pollutant</b>	<b>Construction</b>	<b>Operation</b>
Reactive Organic Gases (ROG)	75	55
Nitrogen Oxides (NO <sub>x</sub> )	100	55
Respirable Particulates (PM <sub>10</sub> )	150	150
Fine Particulates (PM <sub>2.5</sub> )	55	55
Sulfur Oxides (SO <sub>x</sub> )	150	150
Carbon Monoxide (CO)	550	550
Lead <sup>1</sup>	3	3

Source: SCAQMD 1993

Note: 1. Because the proposed project would not involve the development of any major lead emissions sources, lead emissions are not analyzed further in this report.

The SCAQMD developed localized significance threshold methodologies and mass rate look-up tables by source receptor area that can be used to determine whether a project may generate significant adverse localized air quality impacts. LSTs are developed based on the ambient concentrations of pollutants in each source receptor area. The LST methodology is described in the Final Localized Significance Threshold Methodology and is based on LST tables published by the SCAQMD (2009); both documents are available on the SCAQMD website ([www.aqmd.gov](http://www.aqmd.gov)).

The LST mass rate look-up tables provided by the SCAQMD allow a determination as to whether the daily emissions for proposed construction or operational activities could result in significant localized air quality impacts. If the calculated on-site emissions for the proposed construction or operational activities are below the LST emission levels found on the LST mass rate look-up tables, the proposed construction or operation activity is not significant for air quality.

The LST mass rate look-up tables are applicable to the following pollutants only: nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and particulate matter less than 10 microns in aerodynamic diameter (PM<sub>10</sub>). Table entries are derived based on the location of the activity (i.e., the source/receptor area); the emission rates of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>; and the distance to the nearest exposed individual.

The LST methodology presents mass emission rates for each SRA, project sizes of 1, 2, and 5 acres, and nearest receptor distances of 25, 50, 100, 200, and 500 meters. For project sizes between the values given, or with receptors at distances between the given receptors, the methodology uses linear interpolation to determine the thresholds. The SCAQMD recommends that LSTs be analyzed using the California Emissions Estimator Model, version 2016.3.1 equipment list based on the

## 4.0 PROJECT EMISSIONS

maximum number of acres disturbed on the peak day. Because the project site is 1.09 acres, the construction emissions estimated for the proposed project estimate that no more than 1 acre would be disturbed per day. Therefore, for the purposes of the LST analysis, maximum emissions were estimated using the emissions LST screening tables for a 1-acre site. The LSTs for a 1-acre site in SRA 2 (Los Angeles), which is where the project site is located, are shown in **Table 7**.

**TABLE 7**  
**SCAQMD LOCALIZED SIGNIFICANCE THRESHOLDS**

Pollutant	Allowable emissions (lbs/day) as a function of receptor distance (meters) from site boundary				
	25	50	100	200	500
Nitrogen Oxides (NO <sub>x</sub> ) <sup>1</sup>	103	104	121	156	245
Carbon Monoxide (CO)	562	833	1,233	2,367	7,724
Respirable Particulates (PM <sub>10</sub> )	4	12	27	57	146
Fine Particulates (PM <sub>2.5</sub> )	3	4	8	18	77

Source: SCAQMD 2009

Note: 1. The localized thresholds listed for NO<sub>x</sub> in this table take into consideration the gradual conversion of NO to NO<sub>2</sub>. The analysis of localized air quality impacts associated with NO<sub>x</sub> emissions focuses on NO<sub>2</sub> levels as they are associated with adverse health effects.

### Greenhouse Gas Emissions

The California Natural Resources Agency (CNRA) has noted that impacts of GHG emissions should focus on the cumulative impact on climate change. The public notice states:

*While the Proposed Amendments do not foreclose the possibility that a single project may result in greenhouse gas emissions with a direct impact on the environment, the evidence before [CNRA] indicates that in most cases, the impact will be cumulative. Therefore, the Proposed Amendments emphasize that the analysis of greenhouse gas emissions should center on whether a project's incremental contribution of greenhouse gas emissions is cumulatively considerable. (CNRA 2009b)*

Thus, the CEQA Amendments continue to make clear that the significance of GHG emissions is most appropriately considered on a cumulative level. Per Appendix G of the CEQA Guidelines, impacts related to climate change are considered significant if implementation of the proposed project would:

- 1) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- 2) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

In order to assess the significance of a proposed project's environmental impacts, it is necessary to identify quantitative or qualitative thresholds which, if exceeded, would constitute a finding of significance. Determining a threshold of significance for a project's climate change impacts poses a special difficulty for lead agencies. Much of the science in this area is new and is evolving

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constantly. At the same time, neither the state nor local agencies are specialized in this area, nor are there currently state thresholds for determining whether a proposed project has a significant impact on climate change. The CEQA Amendments do not prescribe specific significance thresholds but instead leave considerable discretion to lead agencies to develop appropriate thresholds to apply to projects in their jurisdiction.

The SCAQMD has formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting No. 15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency.

With the tiered approach, the project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from Senate Bill (SB) 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. For all nonindustrial projects, the SCAQMD is proposing a screening threshold of 3,000 metric tons (MT) of CO<sub>2</sub>eq (MTCO<sub>2</sub>eq) per year. The SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, the project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business-as-usual emissions.<sup>1</sup> Under the Tier 4 second option, the project would be excluded if it had early compliance with AB 32 through early implementation of CARB's Scoping Plan measures. Under the Tier 4 third option, the project would be excluded if it was below an efficiency-based threshold of 4.8 MTCO<sub>2</sub>eq per service population per year (MTCO<sub>2</sub>eq/yr).

Tier 5 would exclude projects that implement off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

GHG efficiency metrics are utilized as thresholds to assess the GHG efficiency of a project on a per capita basis or on a service population basis (the sum of the number of jobs and the number of residents provided by a project), such that the project would allow for consistency with the goals of AB 32 (i.e., 1990 GHG emissions levels by 2020 and 2035). GHG efficiency thresholds can be determined by dividing the GHG emissions inventory goal of the state by the estimated 2035 population and employment. This method allows highly efficient projects with higher mass emissions to meet the overall reduction goals of AB 32, and is appropriate, because the threshold can be applied evenly to all project types (residential or commercial/retail only and mixed-use).

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<sup>1</sup> In the recent decision, *Center for Biological Diversity v. California Department of Fish and Wildlife*, the California Supreme Court overturned an environmental impact report related to the proposed Newhall Ranch residential development. The Court observed that CDFW failed to explain why a 29 percent reduction, adopted as the necessary statewide target (applying to new construction, as well as the transportation and energy sectors), should guarantee sufficient reductions for the mixed-use Newhall Ranch project.

## 4.0 PROJECT EMISSIONS

For the proposed project, the 3,000 MTCO<sub>2</sub>eq/yr nonindustrial screening threshold is used as the significance threshold in addition to the qualitative thresholds of significance set forth below from Section VII of CEQA Guidelines Appendix G.

### 4.3 CRITERIA POLLUTANT EMISSIONS ANALYSIS

#### Violation of Air Quality Standards – Construction

Construction emissions are calculated by estimating the types and number of pieces of equipment that would be used to grade, excavate, and balance fill at the project site and to construct the uses proposed under the project. These are analyzed according to the thresholds established by the SCAQMD. Construction activities associated with the proposed project would temporarily increase diesel emissions and would generate particulate matter (dust). Construction equipment on the project site that would generate volatile organic compounds (VOC) and nitrogen oxide (NO<sub>x</sub>) pollutants could include graders, dump trucks, and bulldozers. Some of this equipment would be used during grading activities and during construction of the building on the project site. This environmental assessment assumes that all construction equipment used would be diesel-powered. Construction of the proposed project is anticipated to require a maximum of 24 months and is proposed to begin in winter 2019, concluding in winter 2021. Construction phases would involve demolition, site preparation grading, building construction, and architectural coating. A total of 1.09 acres would be disturbed. Approximately 18,155 cubic yards of material would be exported. Minimal asphalt paving would occur. Detailed assumptions and California Emissions Estimator Model, version 2016.3.1 inputs and outputs are included in **Appendix A**.

**Table 8** identifies the estimated peak daily construction emissions, as calculated using the California Emissions Estimator Model, version 2016.3.1 model. As required by the SCAQMD's Rule 403 (Fugitive Dust), all construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of project development to reduce the amount of particulate matter entrained in the ambient air. Therefore, the California Emissions Estimator Model, version 2016.3.1 model was modified to include fugitive dust controls required by the SCAQMD's Rule 403. It is assumed that all construction activity would occur sequentially; therefore, the total maximum daily emissions are provided, as well as the maximum emissions by construction phase.

As shown in **Table 8**, construction activities would not result in emissions that exceed the SCAQMD thresholds with incorporation of standard fugitive dust controls as required by the SCAQMD's Rule 403. Therefore, no adverse air quality impact would occur.

**TABLE 8**  
**ESTIMATED PEAK DAILY CONSTRUCTION EMISSIONS IN POUNDS PER DAY**

EMISSION SOURCES	PEAK DAY EMISSIONS					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
DEMOLITION	3.59	35.83	22.72	0.04	1.96	1.71
SITE PREPARATION	4.43	45.63	22.86	0.04	20.65	12.18

EMISSION SOURCES	PEAK DAY EMISSIONS					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
GRADING	2.66	28.40	16.95	0.03	8.11	4.69
BUILDING	3.21	23.96	21.78	0.04	3.05	1.72
ARCHITECTURAL COATING	62.68	1.93	3.12	0.00	0.45	0.21
<b>MAXIMUM DAILY EMISSIONS</b>	<b>62.68</b>	<b>45.63</b>	<b>22.86</b>	<b>0.48</b>	<b>20.65</b>	<b>12.18</b>
<b>SCAQMD THRESHOLDS</b>	75	100	550	150	150	55
SIGNIFICANT IMPACT?	No	No	No	No	No	No

Source: SCAQMD 2018 (calculation sheets are provided in **Appendix A**).

### Violation of Air Quality Standards – Operation

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities after buildout of the proposed project. Stationary area source emissions would be generated by space and water heating devices and by the operation of landscape maintenance equipment. Mobile emissions would be generated by motor vehicles traveling to and from the project site.

The results of the California Emissions Estimator Model, version 2016.3.1 calculations for the daily operational emissions of the proposed project are presented in **Table 9**. The emissions reflect the net increase in emissions anticipated from the proposed project. As shown, the daily operational emissions are below the SCAQMD thresholds for all criteria pollutants; therefore, no adverse air quality impact would occur.

## 4.0 PROJECT EMISSIONS

**TABLE 9**  
**ESTIMATED PEAK DAILY OPERATIONAL EMISSIONS IN POUNDS PER DAY**

EMISSION SOURCES	PEAK DAY EMISSIONS					
	VOC	NOx	CO	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>
OFFROAD	0.00	0.00	0.00	0.00	0.00	0.00
AREA	56.92	4.31	117.65	0.25	15.29	15.29
ENERGY	0.11	0.99	0.42	0.01	0.08	0.08
MOBILE	2.87	20.68	34.59	0.14	10.48	2.87
MAXIMUM DAILY EMISSIONS	59.91	26.00	152.67	0.40	25.85	18.24
<b>SCAQMD THRESHOLDS</b>	<b>75</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>SIGNIFICANT IMPACT?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: SCAQMD 2018 (calculation sheets are provided in **Appendix A**).

### Exposure of Sensitive Receptors to Pollutant Concentrations

Construction and operation of the project could potentially expose sensitive receptors located within and adjacent to the project site to CO hot spots, localized air quality impacts from criteria pollutants, and TACs from on-site sources during project construction, as well as TACs from operational sources. Separate discussions are provided below analyzing the potential for sensitive receptors to be exposed to these pollutant sources.

### Carbon Monoxide

Typically, substantial pollutant concentrations of CO are associated with mobile sources (e.g., vehicle idling time). Localized concentrations of CO are associated with congested roadways or signalized intersections operating at poor levels of service (level of service E or lower). High concentrations of CO may negatively affect local sensitive receptors (e.g., residents, schoolchildren, or hospital patients).

A CO hot spot would occur if an exceedance of the state 1-hour standard of 20 ppm or the 8-hour standard of 9 ppm were to occur. When the SCAQMD CEQA Air Quality Handbook was first prepared in 1993, the SoCAB was designated nonattainment under the California and national ambient air quality standards for CO. The analysis prepared for CO attainment in the air basin by the SCAQMD can be used to assist in evaluating the potential for carbon monoxide exceedances in the SoCAB. CO attainment was thoroughly analyzed as part of the SCAQMD's Air Quality Management Plan (SCAQMD 2003) and the Revision to the 1992 Carbon Monoxide Attainment Plan (SCAQMD 1994). As discussed in the 1994 document, peak CO concentrations in the SoCAB are due to unusual meteorological and topographical conditions and are not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, carbon monoxide modeling was performed as part

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of the 1992 Carbon Monoxide Attainment Plan and subsequent plan updates and air quality management plans.

In the 1992 plan, a CO hot-spot analysis was conducted for four busy intersections in Los Angeles during the peak morning and afternoon time periods. The intersections evaluated were Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated in the 1992 plan and the subsequent 2003 Air Quality Management Plan was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day (SCAQMD 2003). The Los Angeles County Metropolitan Transportation Authority (MTA) evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be LOS E during peak morning traffic and LOS F during peak afternoon traffic (MTA 2004).

The project would not produce maximum peak-hour traffic volumes traffic exceeding those at the intersections modeled in the 2003 plan, nor would there be any reason unique to area meteorology to conclude that this intersection would yield higher CO concentrations if modeled in detail. For these reasons, there would be no impact related to CO hot spots.

#### Localized Construction Air Quality Impacts – Criteria Air Pollutants

As discussed previously, the daily construction emissions generated on-site by the project were evaluated against the SCAQMD's localized significance thresholds for a 1-acre site with the nearest sensitive receptor being located within 25 meters. Therefore, a distance of 25 meters is used in this analysis to determine whether the emissions would cause or contribute to adverse localized air quality impacts. **Table 10** identifies daily localized on-site emissions that are estimated to occur during construction of the project. Emissions for the construction activities were calculated using California Emissions Estimator Model, version 2016.3.1, utilizing the construction equipment data provided by the applicant. Detailed assumptions and California Emissions Estimator Model, version 2016.3.1 inputs and outputs are included in **Appendix A**.

## 4.0 PROJECT EMISSIONS

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**TABLE 10**  
**TOTAL CONSTRUCTION EMISSIONS AND LOCALIZED SIGNIFICANCE THRESHOLDS**

<b>POLLUTANT</b>	<b>MAXIMUM ON-SITE CONSTRUCTION EMISSIONS</b>	<b>THRESHOLD OF SIGNIFICANCE<sup>1</sup></b>	<b>QUANTITY OF POLLUTANT EXCEEDING THRESHOLD</b>	<b>SIGNIFICANT IMPACT?</b>
CO	23.96	562	0	<b>No</b>
NO <sub>2</sub>	24.84	103	0	<b>No</b>
PM <sub>10</sub>	0.78	4	0	<b>No</b>
PM <sub>2.5</sub>	0.71	3	0	<b>No</b>

Source: SCAQMD 2018

Note: 1. Thresholds of significance are measured at 500 meters from the proposed project site.

As shown in **Table 10**, the daily emissions generated by the proposed project on-site during all phases of construction would not exceed the established SCAQMD localized significance thresholds for NO<sub>x</sub> (in the form of NO<sub>2</sub>), CO, PM<sub>10</sub>, and PM<sub>2.5</sub> for a 1-acre site in SRA 2. As such, it can be concluded that the project would not result in localized air quality impacts on the nearby surrounding land uses. Therefore, localized air quality impacts would not occur.

### Localized Construction Air Quality Impacts – TACs

Project construction would result in short-term emissions of diesel PM, which is a TAC. Off-road heavy-duty diesel equipment would emit diesel PM during site preparation (e.g., excavation and grading), paving, installation of utilities, materials transport and handling, building construction, and other miscellaneous activities. The SCAQMD has not adopted a methodology for analyzing such impacts and has not recommended that health risk assessments be completed for construction-related emissions of TACs.

The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., the potential exposure to TACs to be compared to applicable standards). Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. Thus, the risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period or duration of activities associated with the proposed project.

The estimated 24-month construction period for the project would be much less than the 70-year period used for risk determination. Because off-road heavy-duty diesel equipment would be used only temporarily, project construction would not expose sensitive receptors to substantial emissions of TACs.

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## Project Operation – TACs

Because the project would result in the development of a 121-room hotel with an additional 17,850 square feet of commercial uses, the development would not involve or introduce any new stationary sources of TACs, such as diesel-fueled backup generators that are more commonly associated with large industrial uses. Therefore, the project would not expose surrounding sensitive receptors to TAC emissions.

## **Objectionable Odors**

If approved, the proposed project would construct a 4-story 80 residential units, with 14,780 square feet of retail commercial space and 126 on-site parking spaces. This type of use would not be expected to result in any additional objectionable odors that would affect a substantial number of people. All trash will be disposed of in lidded containers and routinely emptied by the local waste hauler. Therefore, the proposed project would not result in objectionable odors that could affect a substantial number of people. There would be no impact.

## **Cumulative Impacts**

The project site is located in the SoCAB, which is under the jurisdiction of the SCAQMD. Despite consistent improvements in pollution levels in the basin over the past 30 years, levels of ozone (for which VOC and NO<sub>x</sub> are precursors), PM<sub>10</sub>, and PM<sub>2.5</sub> are above federal and state standards. Therefore, projects could cumulatively exceed an air quality standard or contribute to an existing or projected air quality exceedance. In determining the significance of the proposed project's contribution, the SCAQMD neither recommends quantified analyses of cumulative construction or operational emissions nor provides separate methodologies or thresholds of significance to be used to assess cumulative construction or operational impacts. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed using the same significance criteria as those for project-specific impacts. That is, individual development projects which generate construction-related or operational emissions that exceed the SCAQMD-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 nonattainment.

Since the proposed project does not exceed SCAQMD daily significance thresholds for criteria air pollutants, as described previously, implementation of the proposed project would not result in a cumulatively considerable net increase in criteria air pollutants for the project region.

## **4.4 GREENHOUSE GAS EMISSIONS ANALYSIS**

### **Generation of Greenhouse Gas Emissions**

GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature. The combination of GHG emissions from past, present, and future projects contributes substantially to the phenomenon of global climate change and its associated environmental impacts and as such is addressed only as a cumulative impact.

GHG emissions associated with the project would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. Operational activities would

## 4.0 PROJECT EMISSIONS

result in direct GHG emissions from traffic increases (mobile sources) as well as indirect emissions, through electricity consumption, water use, and solid waste generation.

Based on current methodology, construction GHG emissions are amortized over the life of the project (30 years) and are combined with operational emissions to provide total estimated annual GHG emissions for the life of the proposed project. Construction activities are anticipated to result in a total of approximately 240.47 MTCO<sub>2e</sub>, and the amortized construction emissions would be 13.51 MTCO<sub>2e</sub> per year. Emissions estimates are based on the level of development and on-site operations and were calculated using California Emissions Estimator Model, version 2016.3.1 (Appendix A). Annual emissions for the operation of the project are 824.17 MTCO<sub>2e</sub> per year. **Table 11** shows the total estimated annual GHG emissions from California Emissions Estimator Model, version 2016.3.1 by source. As indicated, the anticipated annual emissions for the project are substantially below the annual threshold of 3,000 MTCO<sub>2e</sub>; therefore, this impact would be **less than significant**.

**TABLE 11**  
**ESTIMATED ANNUAL OPERATIONAL GHG EMISSIONS**

Emissions Sources	Metric Tons per Year			
	CO <sub>2</sub>	CH <sub>4</sub> <sup>a</sup>	N <sub>2</sub> O <sup>a</sup>	CO <sub>2e</sub> <sup>a</sup>
Area	0.001	0.00	0.00	0.001
Energy	359.76	0.001	0.001	360.64
Mobile	1,100.75	0.04	0.00	1,100.94
Waste	12.15	0.71	0.00	27.24
Water	30.12	0.10	0.001	33.12
<b>Operational Source Subtotal</b>				<b>1,521.96</b>
Total Construction				405.30
Amortized Construction <sup>b</sup>				13.51
<b>Total</b>				<b>1,535.47</b>
Threshold				3,000
Significant?				No

Source: SCAQMD 2018 (calculation sheets are provided in **Appendix A**).

a. Totals will not add across rows, as emissions from CH<sub>4</sub> and N<sub>2</sub>O need to be multiplied by their global warming potential in order to convert them to carbon dioxide equivalents (CO<sub>2e</sub>). The math is not shown in the table. The global warming potentials for CH<sub>4</sub> and N<sub>2</sub>O are 21 and 310, respectively. Further, the California Emissions Estimator Model, version 2016.3.1 only reports to the hundredth; therefore, rounding may have also occurred.

b. Amortization assumes project lifetime of 30 years.

### Conflict with Applicable Plan, Policy, or Regulation

California has adopted several policies and regulations for the purpose of reducing GHG emissions. AB 32 was enacted in 2006 to reduce statewide GHG emissions to 1990 levels by 2020. SB 375 (Linking Regional Transportation Plans to State Greenhouse Gas Reduction Goals; codified at Government Code Sections 65080, 65400, 65583, 65584.01, 65584.02, 65584.04, 65587, 65588, 14522.1, 14522.2, and 65080.01 as well as Public Resources Code Sections 21061.3 and 21159.28

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and Chapter 4.2.) was enacted in 2009 with the goal of reducing GHG emissions by limiting urban sprawl and its associated vehicle emissions. Per the requirements of SB 375, SCAG created a Sustainable Communities Strategy (SCS) that integrates transportation and land use elements in order to achieve the emissions reduction target. The SCS encourages transit-oriented development (TOD), which places residential uses and employment centers near mass transit stations to increase use of mass transit and reduce vehicle trips.

In addition, the project would be subject to applicable federal, state, and local regulatory requirements, further reducing project-related GHG emissions. The project would develop commercial land uses in close proximity to an area well served by transit. This would inherently reduce vehicle trips, vehicle miles traveled, and related GHG emissions. The project would not conflict with or impede implementation of reduction goals identified in AB 32, SB 375, and other strategies to help reduce GHG emissions. The project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions and impacts would be less than significant in this regard.

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