

4.2 AIR QUALITY

This section of the EIR analyzes the potential environmental effects on air quality from implementation of the proposed Granada Hills–Knollwood Community Plan and Sylmar Community Plan and implementing ordinances (proposed plans). One comment letter addressing air quality from the South Coast Air Quality Management District (SCAQMD) was received in response to the Notice of Preparation (NOP) circulated for both proposed plans.

Data for this section were obtained from the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, City of Los Angeles General Plan, the proposed policies of the Granada Hills–Knollwood and Sylmar Community Plans Chapter 3 (Project Description) of this EIR, and traffic data provided by Iteris. Full reference-list entries for all cited materials are provided in Section 4.2.5 (References).

4.2.1 Environmental Setting

■ Location and Climate

The Granada Hills–Knollwood Community Plan Area (CPA) contains approximately 9,057 acres while the Sylmar (CPA) contains approximately 6,824 acres in the northeast portion of the City of Los Angeles. These two CPAs are within the South Coast Air Basin (Basin), named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. This 6,600-square-mile area includes all of Orange County and the nondesert portions of Los Angeles, San Bernardino, and Riverside Counties. The regional climate within the Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Basin is influenced by a wide range of emission sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

A semi-permanent, subtropical high-pressure cell over the Pacific Ocean largely controls the climate of the Basin by moderating the difference in seasonal temperatures. The annual average temperature varies little throughout the Basin, with the average in the middle 60s, measured in degrees Fahrenheit (°F). Coastal areas have a more pronounced oceanic influence and show less variability in annual minimum and maximum temperatures than inland areas. The Granada Hills–Knollwood and Sylmar CPAs are located in the central western portion of Los Angeles County, which is in the northwestern portion of the Basin. The annual average temperature in Granada Hills–Knollwood is 64.2°F, with maximum average monthly low of approximately 38.0°F in December (the coldest month) and an average monthly high of approximately 97.0°F in August. The Granada Hills–Knollwood CPA has experienced a record high of 116°F in the August 1985 and a record low of 18°F in February 1989.⁶ The annual average

⁶ The Weather Channel, Monthly Weather for Granada Hills, CA 91344, <http://www.weather.com/weather/wxclimatology/monthly/graph/91344> (accessed May 28, 2012).

temperature in Sylmar is 64.08°F, with average temperatures ranges from approximately 41.0°F in winter to 88.0°F in the summer and recorded low and high of 22°F in the winter and 113°F in the summer.⁷

Although the climate of the Basin can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of Basin climate. Humidity restricts visibility in the Basin. The annual average relative humidity is 71 percent along the coast and 59 percent inland. Because the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast. The majority of annual rainfall in the Basin occurs between November and March. Summer rainfall is minimal and generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the Basin, along the coastal side of the mountains. Average rainfall in the City of Los Angeles is approximately 14 inches annually.⁸ The influence of rainfall on the contaminant levels in the Basin is minimal.

The Basin experiences a persistent temperature inversion, which is characterized by increasing temperature with increasing altitude. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. The mixing height for this inversion structure is normally situated 1,000 to 1,500 feet above mean sea level.

The vertical dispersion of air contaminants in the Basin is also affected by wind conditions. The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are the lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas in the Basin are transported predominantly on-shore into Riverside and San Bernardino Counties.

Winds in the vicinity of the CPAs blow predominantly from the south-southwest, with relatively low velocities. Wind speeds in the CPAs average about 9 miles per hour (mph).⁹ Summer wind speeds are, on average, slightly higher than winter wind speeds. The Santa Ana winds are strong, dry, north or northeasterly winds that occur during fall and winter months, and disperse air contaminants in the Basin. The Santa Ana winds often last for several days at a time.

■ Air Quality Background

Air pollutant emissions within the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources are usually required to have a permit from the SCAQMD in order to operate. Point sources typically occur at specific identified locations, and are usually associated with manufacturing and industry. Some examples of point sources are boilers or combustion equipment that produce electricity or generate heat, such as

⁷ The Weather Channel, Monthly Weather for Sylmar, CA 91342, <http://www.weather.com/weather/wxclimatology/monthly/graph/91342> (accessed May 28, 2012).

⁸ The Weather Channel, Monthly Weather for Granada Hills, CA 91344, <http://www.weather.com/weather/wxclimatology/monthly/graph/91344> (accessed May 28, 2012).

⁹ MyForecast, Historical Information: Granada Hills, CA, http://www.myforecast.com/bin/climate.m?city=KVNY&zip_code=91394&metric=false (accessed August 16, 2012).

heating, ventilation, and air conditioning (HVAC) units. Area sources are widely distributed and produce many small emissions; thus, the SCAQMD does not require operating permits. The area-wide use of area sources contributes to regional air pollution. Examples of area sources include residential and commercial water heaters, painting operations, portable generators, lawn mowers, agricultural fields, landfills, and consumer products, such as barbecue lighter fluid and hairspray. Mobile sources are classified as either on-road or off-road sources. Examples of mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. On-road sources are those that are legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and construction vehicles.

Mobile sources, including diesel trains, off-road construction equipment, and diesel trucks along high volume roadways and freeways, account for the majority of the air pollutant emissions within the Basin. However, air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Both the federal and state governments have established ambient air quality standards for outdoor concentrations of specific pollutants that are referred to as “criteria pollutants,” in order to protect public health. The national and state ambient air quality standards have been set at concentration levels that will protect the most sensitive persons from illness or discomfort with a margin of safety. Applicable ambient air quality standards are identified later in this section. The SCAQMD is responsible for bringing air quality in the Basin into attainment with the national and state ambient air quality standards.

The criteria pollutants for which federal and state standards have been promulgated and that are most relevant to air quality planning and regulation in the Basin are ozone, carbon monoxide, fine suspended particulate matter, nitrogen dioxide, sulfur dioxide, and lead. In addition, toxic air contaminants are of concern in the Basin. Each of these is briefly described below.

- **Ozone (O₃)** is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.
- **Carbon Monoxide (CO)** is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Motor vehicles operating at slow speeds are the primary source of CO in the Basin because the CO is emitted directly from internal combustion engines. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.
- **Respirable Particulate Matter (PM₁₀) and Fine Particulate Matter (PM_{2.5})** consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.
- **Nitrogen Dioxide (NO₂)** is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of nitrogen oxide compounds, NO₂ is the most abundant in the atmosphere. Commuters in heavy traffic may be exposed to higher

concentrations of NO₂ than those indicated by regional monitors, because ambient concentrations of NO₂ are related to traffic density.

- **Sulfur Dioxide (SO₂)** is a colorless, extremely irritating gas or liquid which enters the atmosphere as a pollutant, mainly as a result of burning high sulfur-content fuel oils and coal, as well as from chemical processes occurring at chemical plants and refineries. When sulfur dioxide oxidizes in the atmosphere, it forms sulfates (SO₄). Collectively, these pollutants are referred to as sulfur oxides (SO_x).
- **Lead (Pb)** is a solid heavy metal that can exist in air pollution as an aerosol particle component. An aerosol is a collection of solid, liquid, or mixed-phase particles suspended in the air. Lead was first regulated as an air pollutant in 1976. Leaded gasoline was first marketed in 1923 and was used in motor vehicles until around 1970. The exclusion of lead from gasoline helped to decrease emissions of lead in the United States from 219,000 to 4,000 short tons per year between 1970 and 1997. Even though leaded gasoline has been phased out in most countries, some still use leaded gasoline. Lead ore crushing, lead-ore smelting, and battery manufacturing are currently the largest sources of lead in the atmosphere in the United States. Other sources include dust from soils contaminated with lead-based paint, solid waste disposal, and crustal physical weathering. The mechanisms by which lead can be removed from the atmosphere (sinks) include deposition to soils, ice caps, oceans, and inhalation.

Lead concentrations once exceeded the state and national air quality standards by a wide margin but have not exceeded state or national air quality standards at any regular monitoring station since 1982. Lead is no longer an additive to normal gasoline, which is the main reason concentration of lead in the air is low. Build-out of the CPAs is not anticipated to emit lead, and therefore, lead is eliminated from further review in this analysis.

- **Toxic Air Contaminants (TACs)** refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. Toxic air contaminants are different than “criteria” pollutants in that ambient air quality standards have not been established for them, largely because there are hundreds of air toxics and their effects on health tend to be local rather than regional.

■ Health Effects of Air Pollutants

Ozone

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 sub-groups for ozone (O₃) effects. Short-term exposure (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. Elevated ozone levels are associated with increased school absences. 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.

Ozone exposure under exercising conditions is known to increase the severity of the responses described above. Animal studies suggest that exposure to a combination of pollutants that includes 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.

Carbon Monoxide

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of carbon monoxide (CO) exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport and competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (oxygen deficiency) as seen at high altitudes.

Reduction in birth weight and impaired neurobehavioral development have been observed in animals chronically exposed to CO, resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels; these include pre-term births and heart abnormalities.

Particulate Matter

A consistent correlation between elevated ambient fine particulate matter (PM₁₀ and PM_{2.5}) 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. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer.

Daily fluctuations in PM_{2.5} concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter.

The elderly, people with pre-existing respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of high levels of PM₁₀ and PM_{2.5}.

Nitrogen Dioxide

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 exposure to nitrogen dioxide (NO₂) 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 NO₂ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

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 NO₂.

Sulfur Dioxide

A few minutes of exposure to low levels of sulfur dioxide (SO₂) can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO₂. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO₂.

Animal studies suggest that despite SO₂ being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO₂ levels. In these studies, efforts to separate the effects of SO₂ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Lead

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead (Pb) exposure. Exposure to low levels of Pb 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 Pb levels are associated with increased blood pressure.

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

Odors

The science of odor as a health concern is still new. Merely identifying the hundreds of VOCs that cause odors poses a big challenge. Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, the VOCs that cause odors can stimulate sensory nerves and result in neurochemical changes that might

influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress.

Toxic Air Contaminant Emissions

Toxic Air Contaminants (TACs) are airborne substances that are capable of causing chronic and acute adverse effects on human health. They include both organic and inorganic chemical substances and the noncancer health effects vary depending on the TAC.

Regional Air Quality

Measurements of ambient concentrations of the criteria pollutants are used by the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (California ARB) to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national, state, and federal standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in “attainment.” If the pollutant exceeds the standard, the area is classified as a “nonattainment” area. If there are not enough data available to determine whether the standard is exceeded in an area, the area is designated “unclassified.” Attainment status for the SCAQMD is shown in Table 4.2-1 (Attainment Status for the Basin).

Table 4.2-1 Attainment Status for the Basin		
Pollutant	State Status	Federal Status
Ozone (1-hour)	Extreme Nonattainment	— ^a
Ozone (8-hour)	Extreme Nonattainment	Severe (17 years to attain) (may petition for Extreme)
PM ₁₀	Nonattainment	Nonattainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Attainment/Maintenance
NO ₂	Attainment	Attainment/Maintenance
SO ₂	Attainment	Attainment
Pb	Attainment	Attainment

SOURCE: California Air Resources Board, Area Designations Activities and Maps (last reviewed September 2011), <http://www.arb.ca.gov/desig/changes.htm#summaries> (accessed June 4, 2012); U.S. Environmental Protection Agency, *The Green Book Nonattainment Areas for Criteria Pollutants* (updated March 30, 2012), <http://www.epa.gov/air/oaqps/greenbk/index.html> (accessed June 4, 2012).

a. The federal 1-hour ozone standard was revoked in 2005 and is no longer in effect for the state of California.

The entire Basin is designated as a federal-level severe nonattainment area for ozone, meaning that federal ambient air quality standards are not expected to be met for more than 18 years, and as nonattainment areas for PM₁₀ and PM_{2.5}. It is in attainment for the state and federal CO, NO_x, SO₂, and

Pb standards. The Basin is a state-level extreme nonattainment area for ozone, and is a state-level nonattainment area for PM_{2.5} and PM₁₀.¹⁰

The SCAQMD divides the Basin into forty source receptor areas (SRAs) in which thirty-six monitoring stations operate to monitor the various concentrations of air pollutants in the region. The Granada Hills–Knollwood CPA is located within SRA 6 and the Sylmar CPA is located within SRA 7. The California ARB also collects ambient air quality data through a network of air monitoring stations throughout the state. These data are summarized annually and are published in the California ARB’s California Air Quality Data Summaries. The Reseda and Burbank monitoring stations are the nearest monitoring stations to both CPAs. The Reseda station currently monitors emission levels of O₃, CO, NO₂, and PM_{2.5}. The Burbank monitoring station monitors for O₃, CO, NO₂, PM_{2.5}, PM₁₀ and SO₂.

Table 4.2-2 (Summary of Ambient Air Quality in the Vicinity of the Granada Hills–Knollwood and Sylmar CPAs) identifies the national and state ambient air quality standards for the relevant air pollutants and identifies the ambient pollutant concentrations that have been measured at the Reseda and Burbank monitoring stations from 2009 through 2011. 2009 and 2010 Monitoring Data for Granada Hills–Knollwood CPA was taken from SRA 6 (West San Fernando Valley) for CO, ozone, NO₂, and PM_{2.5}. PM₁₀ and SO₂ were taken from SRA 6 monitoring data as it was not available for SRA7. Monitoring data for 2011 was taken obtained from the California Air Resources Board (ARB) website for the Reseda monitoring station for CO, ozone, NO₂, and PM_{2.5}, and from the Burbank station for PM₁₀ and SO₂. 2009 and 2010 Monitoring Data for the Sylmar CPA was taken from SRA 7 (East San Fernando Valley) for CO, ozone, NO₂, PM₁₀, PM_{2.5}, and SO₂. For 2011 the monitoring data was taken from the ARB website for the Burbank monitoring station for the same criteria pollutants.

According to air quality data shown in Table 4.2-2, the national 8-hour ozone standard has been exceeded in the past 3 years in both the Granada Hills–Knollwood and Sylmar CPAs; 64 times for Granada Hills–Knollwood and 24 for Sylmar. The state 1-hour and 8-hour ozone standards were exceeded a total of 43 and 106 days respectively for the Granada Hills–Knollwood CPA and 27 and 49 days respectively for the Sylmar CPA, over the past three years. No national or state standards for CO or NO₂ have been exceeded over the last 3 years within the CPAs. The Particulate Matter (PM₁₀) was not exceeded over the last 3 years for national 24-hour standards; however, the state 24-hour standard was exceeded a total of 14 days for SRA 6 and SRA 7. The national standard for PM_{2.5} was exceeded 5 times for SRA 6 and 13 times for SRA 7 over the last 3 years.

¹⁰ California Air Resources Board, Area Designations Activities and Maps (last reviewed September 2011), <http://www.arb.ca.gov/desig/changes.htm#summaries> (accessed June 4, 2012); U.S. Environmental Protection Agency, *The Green Book Nonattainment Areas for Criteria Pollutants* (updated March 30, 2012), <http://www.epa.gov/air/oaqps/greenbk/index.html> (accessed June 4, 2012).

Table 4.2-2 Summary of Ambient Air Quality in the Vicinity of the Granada Hills–Knollwood and Sylmar CPAs

Air Pollutants Monitored Within	SRA 6 (Reseda) (Granada Hills)			SRA 7 (Burbank) (Sylmar)		
	2009	2010	2011	2009	2010	2011
Ozone (O₃)						
Maximum 1-hour concentration measured	0.135 ppm	0.122 ppm	0.130 ppm	0.145 ppm	0.111 ppm	0.120 ppm
Number of days exceeding state 0.09 ppm 1-hour standard	15	11	17	16	3	8
Maximum 8-hour concentration measured	0.10 ppm	0.091 ppm	0.103 ppm	0.086 ppm	0.084 ppm	0.084 ppm
Number of days exceeding national 0.075 ppm 8-hour standard	19	19	26	14	4	6
Number of days exceeding state 0.07 ppm 8-hour standard	31	40	35	28	11	10
Nitrogen Dioxide (NO₂)						
Maximum 1-hour concentration measured	0.07 ppm	0.075 ppm	0.070 ppm	0.09 ppm	0.082 ppm	0.068 ppm
Number of days exceeding state 0.18 ppm 1-hour standard	0	0	0	0	0	0
Annual average	0.0170 ppm	0.0167 ppm	0.016 ppm	0.0274	0.0241	N/A
Number of days exceeding state 0.03 ppm annual average	0	0	0	0	0	N/A
Number of days exceeding national 0.0534 ppm annual average	0	0	0	0	0	N/A
Carbon Monoxide (CO)						
Maximum 1-hour concentration measured	4 ppm	3 ppm	NA	3 ppm	3 ppm	NA
Number of days exceeding national 35.0 ppm 1-hour standard	0	0	NA	0	0	NA
Number of days exceeding state 20.0 ppm 1-hour standard	0	0	NA	0	0	NA
Maximum 8-hour concentration measured	2.8 ppm	2.6 ppm	2.77 ppm	2.9 ppm	2.4 ppm	2.37 ppm
Number of days exceeding national 9.0 ppm 8-hour standard	0	0	0	0	0	0
Number of days exceeding state 9.0 ppm 8-hour standard	0	0	0	0	0	0
Suspended Particulates (PM₁₀)						
Maximum 24-hour concentration measured i	80µg/m ³	51µg/m ³	60µg/m ³	80µg/m ³	51µg/m ³	60µg/m ³
Number of days exceeding national 150 µg/m ³ 24-hour standard	0	0	0	0	0	0
Number of days exceeding state 50.0 µg/m ³ 24-hour standard	11	1	2	11	1	2
Annual Average Concentration µg/m ³	39.2µg/m ³	29.6µg/m ³	25.0µg/m ³	39.2µg/m ³	29.6µg/m ³	25.0µg/m ³

Table 4.2-2 Summary of Ambient Air Quality in the Vicinity of the Granada Hills–Knollwood and Sylmar CPAs

Air Pollutants Monitored Within	SRA 6 (Reseda) (Granada Hills)			SRA 7 (Burbank) (Sylmar)		
	2009	2010	2011	2009	2010	2011
Suspended Particulates (PM_{2.5})						
Maximum 24-hour concentration measured	39.9µg/m ³	40.7µg/m ³	39.8µg/m ³	67.5µg/m ³	43.7µg/m ³	47.8µg/m ³
Number of days exceeding national 35 µg/m ³ 24-hour standard	1	1	3	4	4	5
Sulfur Dioxide (SO₂)						
Maximum 24-hour concentration measured in ppm	0.003µg/m ³	0.0149µg/m ³	0.002µg/m ³	0.003µg/m ³	0.0149µg/m ³	0.002µg/m ³
Number of days exceeding state 0.04 ppm 24-hour standard	0	0	0	0	0	0

SOURCE: California ARB (2011); SCAQMD (2009, 2010).
ppm = parts by volume per million of air; µg/m³ = micrograms per cubic meter.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to 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 cardio-respiratory diseases. Residential areas are considered to be sensitive 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 as sensitive, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution because exercise places a high demand on respiratory functions, which can be impaired by air pollution.

Standard Conditions and Uniform Codes

All projects constructed in the Basin are subject to Standard Conditions and Uniform Codes. Compliance with these provisions is mandatory and, as such, would not be required as mitigation under CEQA. Those conditions specific to air quality are included below:

- Adherence to SCAQMD Rule 403, which sets requirements for dust control associated with grading and construction activities.
- Adherence to SCAQMD Rules 431.1 and 431.2, which require the use of low sulfur fuel for stationary construction equipment.
- Adherence to SCAQMD Rule 1108, which sets limitations on ROG content in asphalt.
- Adherence to SCAQMD Rule 1113, which sets limitations on ROG content in architectural coatings.
- Adherence to Title 24 energy-efficient design requirements as well as the provision of window glazing, wall insulation, and efficient ventilation methods in accordance with the requirements of the Uniform Building Code.

Construction of development projects pursuant to the proposed plans would be subject to SCAQMD Rule 403 (fugitive dust) during construction activities. SCAQMD Rule 403 does not require a permit for construction activities, per se, but sets forth general and specific requirements for all construction sites (as well as other fugitive dust sources) in the Basin. The general requirement prohibits a person from causing or allowing emissions of fugitive dust from construction (or other fugitive dust source) such that the presence of dust remains visible in the atmosphere beyond the property line of the emissions source. SCAQMD Rule 403 also prohibits a construction site from causing an incremental PM_{10} concentration impact at the property line of more than 50 micrograms per cubic meter as determined through PM_{10} high-volume sampling, but the concentration standard and associated PM_{10} sampling do not apply if specific measures identified in the rules are implemented and appropriately documented.

In accordance with Rule 403, the SCAQMD requires that contractors implement Best Available Control Technology (BACT) for construction activities. Rule 403 identifies a set of specific measures for projects less than 50 acres. The BACTs also contain contingency measures that shall be applied to those periods where instantaneous wind gusts meet or exceed 25 mph. These requirements are included in Appendices B1 and B2.

■ Local Air Quality

The Basin has experienced improved air quality in recent years due to more stringent vehicle emissions standards, the elimination of older polluting vehicles, and cleaner burning fuels. In addition, larger stationary emission sources are gradually being eliminated or undergoing retrofitting with best available pollution control technology (BACT).

Motor vehicles (off highway and highway) are the primary source of pollutants in the CPAs. Local emissions sources also include stationary activities, such as space and water heating, landscape maintenance from leaf blowers and lawn mowers, consumer products, and mobile sources. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed “CO hotspots.” Chapter 5 of the SCAQMD’s CEQA Air Quality Handbook identifies CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots.

The SCAQMD recommends the use of CALINE4, a dispersion model for predicting CO concentrations, as the preferred method of estimating pollutant concentrations at sensitive receptors near congested roadways and intersections. For each intersection analyzed, CALINE4 adds roadway-specific CO emissions calculated from peak hour turning volumes to ambient CO air concentrations. This methodology assumes worst-case conditions and provides a screening of maximum, worst-case CO concentrations.

Maximum existing CO concentrations were calculated for ten of the intersections within each CPA that would be affected by plan-related traffic and represent level of service of D, E, or F and the most daily traffic as determined from the traffic report prepared by Iteris (Appendix G). As all other intersections are expected to operate at a better LOS, those intersections would produce lower CO concentrations. The results of these calculations are presented in Table 4.2-3 (Existing Localized Carbon Monoxide Concentrations [Granada Hills–Knollwood]) and Table 4.2-4 (Existing Localized Carbon Monoxide Concentrations [Sylmar]). The national 1-hour standard is 35.0 parts per million (ppm), and the state 1-hour standard is 20.0 ppm. The 8-hour national and state standards are both 9.0 ppm. As shown in Table 4.2-3 and Table 4.2-4, no intersection currently exceeds national or state standards for 1-hour or 8-hour CO concentrations. Therefore, CO hotspots do not currently exist in the project area.

Toxic Air Contaminants

Toxic air contaminants are airborne substances that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. They include both organic and inorganic chemical substances that may be emitted from a variety of common sources including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. Toxic air contaminants are different than the “criteria” pollutants previously discussed, in that ambient air quality standards have not been established for them, largely because there are hundreds of air toxics and their effects on health tend to be local rather than regional.

Table 4.2-3 Existing Localized Carbon Monoxide Concentrations (Granada Hills–Knollwood)

<i>Intersection</i>	<i>Level of Service</i>	<i>Peak Hour Volume</i>	<i>1-Hr Conc. (ppm)</i>	<i>8-Hr Conc. (ppm)</i>	<i>Exceeds Standard</i>
State Standards	—	—	20	9	—
Zelzah Ave / Rinaldi St	F	1,633	6.0	4.2	No
Balboa Blvd / Balboa Rd	F	3,506	7.4	5.2	No
Balboa Blvd / Senson Blvd	F	3,518	7.3	5.1	No
Balboa Blvd / Rinaldi St	F	4,543	8.3	5.8	No
Balboa Blvd / Pineridge Dr	E	4,316	8.3	5.8	No
Balboa Blvd / Knollwood Dr	E	4,277	8.6	6.0	No
Balboa Blvd / Woodley Ave	E	3,573	7.6	5.3	No
Hayvenhurst Ave/ Index St	D	2,124	6.1	4.3	No
Balboa Blvd / Lassen St	D	5,346	8.8	6.2	No
Hayvenhurst / Lassen St	D	2,818	6.3	4.4	No

SOURCE: Atkins (2012) (calculation sheets are provided in Appendix B1).

a. National 1-hour standard is 35.0 parts per million. State 1-hour standard is 20.0 parts per million.

b. National 8-hour standard is 9.0 parts per million. State 8-hour standard is 9.0 parts per million.

c. Data for the 1-hour concentration was taken from the highest peak hour result, AM peak hour or PM peak hour, whichever is greater.

Table 4.2-4 Existing Localized Carbon Monoxide Concentrations (Sylmar)

<i>Intersection</i>	<i>Level of Service</i>	<i>Peak Hour Volume</i>	<i>1-Hr Conc. (ppm)</i>	<i>8-Hr Conc. (ppm)</i>	<i>Exceeds Standard</i>
State Standards	—	—	20	9	—
Encinitas Ave / Roxford St	F	2,708	5.4	1.7	No
Encinitas Ave / Cobalt St	F	1,358	4.7	1.2	No
Telfair Ave / Roxford St	F	2,623	5.5	1.8	No
San Fernando Rd / Cobalt St	F	1,896	4.7	1.2	No
Foothill Blvd / Astoria St	F	2,841	5.6	1.8	No
Foothill Blvd / Hubbard St	E	4,773	6.1	2.2	No
Foothill Blvd/ Sayre St	E	2,837	5.6	1.8	No
Foothill Blvd/ Maclay St	E	3,719	5.8	2.0	No
Bradley Ave/ Roxford St	E	1,322	4.4	1.0	No
Herrick St/ Roxford St	E	1,093	4.3	0.9	No

SOURCE: Atkins (2012) (calculation sheets are provided in Appendix B2).

a. National 1-hour standard is 35.0 parts per million. State 1-hour standard is 20.0 parts per million.

b. National 8-hour standard is 9.0 parts per million. State 8-hour standard is 9.0 parts per million.

c. Data for the 1-hour concentration was taken from the highest peak hour result, AM peak hour or PM peak hour, whichever is greater.

Lifetime cancer risk is defined as the increased chance of contracting cancer over a 70-year period as a result of exposure to a toxic substance or substances. It is the product of the estimated daily exposure of

each suspected carcinogen by its respective cancer unit risk. The end result represents a worst-case estimate of cancer risk. The SCAQMD has produced an interactive inhalation cancer risk map based on the Mates II and Mates III studies that provides an analysis of existing health risks within the District. According to the Mates III study¹¹ the existing cancer risk within the Granada Hills–Knollwood CPA is between 399 and 781 cases in a million, and within the Sylmar CPA cancer risk is 331 to 664 cases in a million. These risk maps depict inhalation cancer risk due to modeled outdoor toxic pollutant levels, and do not account for cancer risk due to other types of exposure. The largest contributors to inhalation cancer risk are diesel engines.

4.2.2 Regulatory Framework

■ Federal

U.S. Environmental Protection Agency (USEPA)

The Clean Air Act (CAA) of 1970 and the CAA Amendments of 1971 required the USEPA to establish National Ambient Air Quality Standards (NAAQS), with states retaining the option to adopt more stringent standards or to include other specific pollutants.

These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those “sensitive receptors” most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

The CAA (and its subsequent amendments) requires each State to prepare an air quality control plan referred to as the State Implementation Plan (SIP). The CAA Amendments dictate that states containing areas violating the NAAQS revise their SIPs to include extra control measures to reduce air pollution. The SIP includes strategies and control measures to attain the NAAQS by deadlines established by the CAA. The SIP is periodically modified to reflect the latest emissions inventories, plans, and rules and regulations of air basins as reported by the agencies with jurisdiction over them. The USEPA has the responsibility to review all SIPs to determine if they conform to the requirements of the CAA.

■ State

California Air Resources Board (California ARB)

The California Air Resources Board (California ARB), part of the California Environmental Protection Agency (Cal/EPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, California ARB conducts research, sets state ambient air quality standards (California Ambient Air Quality Standards), compiles emission

¹¹ South Coast Air Quality Management District, *Final Report, Multiple Air Toxic Exposure Study in the South Coast Air Basin* (September 2008); South Coast Air Quality Management District, *Multiple Air Toxics Exposure Study III, Model Estimated Carcinogenic Risk, Interactive Map*, <http://www2.aqmd.gov/webappl/matesiii/> (accessed June 4, 2012).

inventories, develops suggested control measures, and provides oversight of local programs. California ARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. California ARB has primary responsibility for the development of California's State Implementation Plan (SIP), and works closely with the federal government and the local air districts.

■ Regional

South Coast Air Quality Management District (SCAQMD)

The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments and cooperates actively with all federal and state government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

Air Quality Management Plan

The SCAQMD and the SCAG are the agencies responsible for preparing the Air Quality Management Plan (AQMP) for the Basin. Since 1979, a number of AQMPs have been prepared. The 1997 AQMP, updated in 1999 and replaced in 2003, was based on the 1994 and 1991 AQMPs, and was designed to comply with state and federal requirements, reduce the high level of pollutant emissions in the Basin and ensure clean air for the region through various control measures. To accomplish its task, the AQMP relied on a multilevel partnership of governmental agencies at the federal, state, regional, and local level. These agencies (i.e., the USEPA, the California ARB, local governments, SCAG, and SCAQMD) are the cornerstones that implement the AQMP programs.

The 2003 AQMP, adopted in August 2003, updated the attainment demonstration for the federal standards for ozone and PM₁₀; replaced the 1997 attainment demonstration for the federal CO standard and provided a basis for a maintenance plan for CO for the future, and updated the maintenance plan for the federal NO₂ standard that the Basin has met since 1992.

The most recent comprehensive plan is the 2007 AQMP, adopted on July 13, 2007. The 2007 AQMP is designed to meet the state and federal Clean Air Act planning requirements and focuses on ozone and PM_{2.5}. The 2007 AQMP incorporates significant new emissions inventories, ambient measurements, scientific data, control strategies, and air quality modeling.

The SCAQMD is in the process of developing the 2012 Air Quality Management Plan, which will incorporate the most recent scientific and technological information and planning assumptions for the region. This includes the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy and the updated emissions inventory methodologies for the various sources. The 2012 AQMP is

currently being developed to implement a zero or near-zero emissions measures so the Basin can achieve attainment of the particulate matter and ozone standards.¹²

Local

City of Los Angeles General Plan

In November 1992, the City of Los Angeles adopted the Air Quality Element to the General Plan (Air Quality). The Air Quality Element’s primary objectives were to aid the region in attaining and maintaining the NAAQS while continuing to foster economic growth and the improvement of the quality of life of City residents. Further the Air Quality Element described how the City planned to implement local programs that were contained in the regional plan. The purpose of the proposed plans is to update the Land Use Element of the Los Angeles General Plan. Table 4.2-5 (General Plan Policies Relevant to Air Quality) lists the policies in the 1992 Los Angeles General Plan Air Quality Element that pertain to air quality.

Table 4.2-5 General Plan Policies Relevant to Air Quality	
Policy No.	Policy
Air Quality Element	
Policy 1.1.1	Encourage demonstration projects which involve creative and innovative uses of market incentives mechanisms to achieve air quality objectives.
Policy 1.2.1	Implement the Air Quality Element policies set forth in this chapter through adoption of the Clean Air Program which shall be amended as Council sees necessary without General Plan Amendment.
Policy 1.2.2	Pursue the City’s air quality objectives in cooperation with regional and other local jurisdictions.
Policy 1.2.3	Monitor and assess the progress of the City’s air quality improvement programs.
Policy 1.3.1	Minimized particulate emissions from construction sites.
Policy 1.3.2	Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.
Policy 2.1.1	Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling-related facilities in order to reduce vehicle trips and/or vehicle miles traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.
Policy 2.1.2	Facilitate and encourage the use of telecommunications (i.e., telecommuting), in both the public and private sectors, in order to reduce work trips.
Policy 2.2.1	Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.
Policy 2.2.2	Encourage multi-occupant vehicle travel and discourage single-occupant vehicle by instituting parking management practices.
Policy 2.2.3	Minimize the use of single-occupant vehicles associated with special events or in areas of high levels of pedestrian activities.
Policy 3.1.1	Implement programs to finance and improve public transit facilities and service.
Policy 3.1.2	Address public safety concerns as part of transit improvement programs, such as guarded and/or well lit transit facilities, emergency equipment and safe-driving training for operators, in order to increase transit ridership.

¹² South Coast Air Quality Management District, *2012 Air Quality Management Plan* (2012), <http://www.aqmd.gov/aqmp/2012aqmp/index.htm> (accessed June 5, 2012).

Table 4.2-5 General Plan Policies Relevant to Air Quality	
<i>Policy No.</i>	<i>Policy</i>
Policy 3.1.3	Cooperate with regional transportation agencies in expediting the development and implementation of regional transit systems.
Policy 3.2.1	Manage traffic congestion during peak hours.
Policy 3.3.1	Implement the best available system management techniques, and transportation management and mobility action plans to improve the efficiency of existing transportation facilities, subject to availability of funding.
Policy 4.1.1	Coordinate with all appropriate regional agencies to implementation of strategies for the integration of land use, transportation, and air quality policies.
Policy 4.1.2	Ensure that project level review and approval of land use development remain at the local level.
Policy 4.2.1	Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.
Policy 4.2.2	Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.
Policy 4.2.3	Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.
Policy 4.2.4	Require that air quality impacts can be a consideration in the review and approval of discretionary projects.
Policy 4.2.5	Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.
Policy 4.3.1	Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks to sensitive receptors.
Policy 4.3.2	Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.
Policy 5.1.1	Make improvements in harbor and airport operations and facilities in order to reduce air emissions.
Policy 5.1.2	Effect a reduction in energy consumption and shift to nonpolluting sources of energy in its buildings and operations.
Policy 5.1.3	Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.
Policy 5.1.4	Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.
Policy 5.2.1	Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel powered vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.
Policy 5.3.1	Support the development and use of equipment powered by electric or low-emitting fuels.
Policy 6.1.1	Raise awareness through public information and education programs of the actions that individuals can take to reduce air emissions.

SOURCE: Los Angeles Department of City Planning, *General Plan of the City of Los Angeles*, Air Quality Element (adopted November 24, 1992).

Specific Plans

The Granada Hills–Knollwood Specific Plan was adopted in 1992, and amended in 2000 and 2006. The Granada Hills–Knollwood Specific Plan has no regulations or policies that specifically address air quality.

There is no specific plan for the Sylmar CPA.

■ Proposed Plan Policies

In Los Angeles, thirty-five Community Plans, including the proposed Granada Hills–Knollwood and Sylmar Community Plans, comprise the City's Land Use Element. The proposed plans set a new

direction for the future of the CPAs using a collaborative effort between City staff and residents, businesses, developers, design professionals, and property owners to achieve the vision of the Granada Hills–Knollwood and Sylmar CPAs.

Table 4.2-6 (Proposed Granada Hills–Knollwood Community Plan Policies) lists the proposed plan policies that address air quality impacts within the Granada Hills–Knollwood CPA.

Table 4.2-6 Proposed Granada Hills–Knollwood Community Plan Policies	
<i>Policy No.</i>	<i>Policy</i>
Policy LU5.1	"Green" Building. Utilize "green" building strategies such as solar panels, insulating buildings to minimize consumption of nonrenewable natural resources, and orienting windows, building volumes and second stories to maximize solar access.
Policy LU5.3	Landscaping. Retain existing vegetation and trees and use native and drought-tolerant landscape and drip irrigation when developing the site in order to conserve water.
Policy LU5.4	Canopy Trees. Provide canopy trees in planting areas for shade and energy efficiency, especially on south and southwest facing facades.
Policy LU15.3	Pedestrian and Bicycle Amenities. Provide pedestrian and bicycle amenities such as trash receptacles, street furniture, bicycle racks, and enhanced crosswalks as part of new projects to enhance the street atmosphere and encourage walking and bicycling.
Policy LU16.1	"Green" Design. Design new development to use green building strategies such as solar panels, insulating buildings to minimize consumption of nonrenewable natural resources.
Policy LU18.2	Pedestrian-Friendly Buildings. Design new commercial and mixed use buildings and additions so that they enhance the public realm through well designed frontages that provide pedestrian-scaled features such as awnings, plazas, and courtyards and direct access from public sidewalks.
Policy M5.1	Bikeway Connections. Provide bicycle access for open space areas, commercial corridors, Neighborhood Districts and Community Centers to allow easy connection between residential neighborhoods and employment centers, as well as important nonwork destinations.
Policy M5.2	Bicycle Priority Streets. Support the Citywide bikeway network to establish bicycle circulation as paramount to vehicular circulation needs on key streets and to encourage investment in bicycle improvements and programs on these identified streets.
Policy M5.3	Bicycle Amenities. Incorporate bicycle amenities, such as parking, lockers, changing rooms and showers in public facilities, parks, commercial developments, employment and transit centers and park and ride facilities.
Policy M5.4	Regional Coordination. Coordinate with appropriate City and County agencies, adjacent jurisdictions, nonprofit organizations, and the local community to require that bikeways be linked with those existing and proposed in adjacent areas.
Policy M8.1	Transit Connections to Key Areas. Increase public transit access to neighborhood districts and community centers. Coordinate with Metro and the Department of Transportation to improve local, Metro Rapid, and community-level bus service.
Policy M8.2	Development at Transit Nodes. Facilitate development and public improvements at multimodal transit nodes, or intersections that Metro identifies as major transfer nodes to promote convenient access between new development and the transit system.
Policy M8.3	Private Transit. Encourage new major developments to provide on-demand shuttle services to Metro stations, community centers, or destinations in and around Granada Hills–Knollwood.
Policy M9.1	Transit Priority Streets. Support the identification of transit priority street segments with high transit vehicle volumes to facilitate public transit circulation as paramount to vehicular circulation needs and to encourage investment in transit improvement programs for the identified routes.

Table 4.2-6 Proposed Granada Hills–Knollwood Community Plan Policies	
<i>Policy No.</i>	<i>Policy</i>
Policy M9.2	Transit Access and Amenities. Provide enhanced amenities at major transit stops, including widened sidewalks, where possible, pedestrian waiting areas, transit shelters, enhanced lighting, improved crosswalks, information kiosks, and advanced fare collections mechanisms, shade trees, bicycle access and self-cleaning restrooms. Improve the ease and convenience of using transit by making improvements to transit waiting areas and pedestrian and bicycle routes leading to transit waiting areas.
Policy M9.3	Street Enhancements for Buses. Support street improvements which are needed to facilitate the movement of buses, such as jog eliminations, street widening, bus bays or turnouts, street signage, striping, and colored pavement.
Policy M9.4	Express Bus Focus. Connect express bus service, such as DASH, Commuter Express, Metro Rapid and Bus Rapid Transit, to transit centers; and park and ride facilities to key destinations within the Community Plan and region.
Policy M10.1	Priorities for Capacity Enhancements. Implement a safe and efficient transportation network, and increase its capacity through, in priority order, the provision of alternative transit options (Transit), transportation demand management (TDM), and traffic system management (TSM) before considering street widening and network completion.
Policy M10.2	Motorized Vehicle Priority Routes. Support the identification of motorized vehicle streets for arterials with the highest traffic volumes and demonstrated congestion to establish motorized vehicle circulation as paramount to alternative roadway user needs and to encourage investment in congestion relief programs and/or truck safety improvements for the identified routes.
Policy M10.3	Access Management. Minimize driveways and consider the addition of medians or designated right-of-way for nonmotorized traffic on Major and Secondary Highways to ensure the smooth and safe flow of vehicles, buses, pedestrians, equestrians and bicycles.
Policy M10.4	Alley Access. Discourage the vacation and/or closure of existing public alleys in commercial districts and provide for alley access for properties fronting on Major or Secondary highways.
Policy M10.5	Emergency Access. Develop, improve, and maintain hillside streets that are easily accessible to emergency vehicles.
Policy M10.6	Coordinated Evacuation Routes. Establish a network of routes that facilitate orderly evacuation of the community in an emergency, consistent with the Emergency Management Department adopted Evacuation Plan.
Policy M11.1	Traffic Calming. Support traffic calming measures and parking management for local and collector streets where demonstrated need exists and with active community involvement, while maintaining pedestrian and bicycle circulation.
Policy M11.2.	Traffic Mitigations for Development. Require major developments to mitigate traffic impacts on residential neighborhoods.
Policy M12.1	Regional Coordination. Coordinate with Council of Government and regional transportation planning agencies (such as SCAG and Metro) and adjacent cities to improve shuttle services, encourage ride sharing, bicycle sharing, and other TDM programs within the region.
Policy M12.2	Auto Trip Reduction. Create incentives for employers, institutions, and residential neighborhoods to reduce their vehicle trips by encouraging mixed use developments that reduce the number of vehicle miles traveled.
Policy M12.3	Alternatives to the Automobile. Reduce automobile dependency by providing a safe, convenient transit system, pedestrian linkages and a network of safe and accessible bikeways and recreational trails by encouraging alternatives, including reduced emission vehicles, such as electric and neighborhood electric vehicles (NEVs).
Policy M12.4	TDM Plans. Encourage major development to submit a TDM Plan to the City and provide employee incentives for utilizing alternatives to the single-driver automobile (i.e., carpools, vanpools, buses, telecommuting, bicycling, and walking.)
Policy M12.5	Transportation Management Associations. Support the formation of agencies and collaboratives such as Transportation Management Associations (TMAs) that facilitate ridesharing in carpools and vanpools.
Policy M13.1	Industrial Center Siting. Site regional distribution centers and other industrial districts proximate to the freeway system, regional truck routes, and rail lines, avoiding adjacency to residential neighborhoods.
Policy M13.2	Efficient Truck and Freight Movement. Provide appropriately designed and maintained roadways to safely accommodate truck travel and minimize adverse impacts of freight transport on residential neighborhoods.
Policy M14.5.	Convenient Parking. Provide public parking proximate to transit centers, commercial areas, and public facilities.

Table 4.2-6 Proposed Granada Hills–Knollwood Community Plan Policies	
<i>Policy No.</i>	<i>Policy</i>
Policy M15.1	Park Once Strategy. Collaborate with the business community to improve parking services, including shared-parking facilities and public valet services in appropriate locations to more effectively use the overall parking supply and implement a “park once and walk” strategy for commercial districts, especially on Chatsworth Street in the downtown core.
Policy M15.2	Priority Parking for Alternative Fuel Vehicles. Encourage new commercial and retail developments to provide prioritized parking for shared vehicles, electric vehicles and vehicles using alternative fuels.
Policy M15.3	Connections for Electric Vehicles. Encourage new construction to include vehicle access to properly wired outdoor receptacles to accommodate zero emission vehicles (ZEVs) and/or plug-in electric hybrids (PHEV).
Policy CF8.1	Urban Forest. Encourage the preservation of the existing tree population and include new trees in an effort to achieve optimum canopy cover to reduce and mitigate the heat island effect. Include on- site trees in new development projects, whenever possible.
Policy CF8.2	Tree Protection. Encourage and promote the retention of trees, particularly orange trees, where practical and appropriate, through education, outreach and incentives offered by the Bureau of Street Services.
Policy CF8.3	Tree Selection. Support policies of the Bureau of Street Services to reduce conflicts with existing infrastructure through proper tree selection and through the recognition of street trees as a vital component of the City’s infrastructure.
Policy CF8.6	Sustainable Design. Develop design standards that promote the sustainable development in public and private open space and street rights-of-way.
Policy CF8.7	Partnerships. Encourage community and private partnerships in urban forestry issues, minimizing maintenance costs. Collaborate with other City departments, neighborhood associations, business improvement districts and private developers to promote trees in parkways, landscaped medians, community gateways, and throughout.
Policy CF13.5	Energy Conservation. Integrate energy conservation techniques into new and existing development projects.

Table 4.2-7 (Proposed Sylmar Community Plan Policies) lists the proposed plan policies that address air quality impacts within the Sylmar CPA.

Table 4.2-7 Proposed Sylmar Community Plan Policies	
<i>Policy No.</i>	<i>Policy</i>
Policy LU7.1	“Green” Building. Utilize “green” building strategies such as solar panels, insulating buildings to minimize consumption of nonrenewable natural resources, and orienting windows, building volumes and second stories to maximize solar access.
Policy LU7.3	Landscaping. Retain existing vegetation and trees and use native and drought-tolerant landscape and drip irrigation when developing the site in order to conserve water.
Policy LU7.4	Canopy Trees. Provide canopy trees in planting areas for shade and energy efficiency, especially on south and southwest facing facades.
Policy LU10.2	Pedestrian Pathways. Provide accessible, comfortable, and safe pedestrian connections within and around the project. For units not adjacent to a street, provide landscaped pedestrian pathways that are separate from auto circulation routes.
Policy LU14.5	On-site Landscaping. Provide landscaped areas with shade trees on-site that complement the character of the built environment, add beauty and visual interest, increase pedestrian comfort, and extend the sense of the public-right-of-way onto the site.
Policy LU14.3	Pedestrian Access and Connections. Provide safe and direct pedestrian entrances from the sidewalk and the street and encourage connections to abutting commercial development. Utilize techniques to increase motorist awareness of pedestrians, such as lighting, raised crosswalks, changes in paving, signage or other devices.

Table 4.2-7 Proposed Sylmar Community Plan Policies	
<i>Policy No.</i>	<i>Policy</i>
Policy LU14.6	Streetscape. Design developments to create inviting districts with landscaped sidewalks lined with shade trees, street furniture, and other pedestrian amenities (or streetscape features), open with visual and physical permeability, and pedestrian-oriented connections, where local residents will be attracted and encouraged to walk to nearby commercial establishments.
Policy LU15.7	Pedestrian Amenities. Enhance the pedestrian-friendly environment of Foothill Boulevard by increasing street and property lighting, improving way-finding signage, providing bus stop shelters and other pedestrian amenities. Consider providing sidewalk “pop-outs” at Hubbard Street, Sayre Street, and Astoria Street as part of new developments to further enhance the pedestrian environment.
Policy LU16.1	Eco-Friendly Design. Design new buildings to express the climate of Sylmar through their orientation, massing, and construction. Consider utilizing passive solar design strategies, such as overhangs and shade trees, orienting building volumes, windows, and second-stories to maximize solar access, constructing well-insulated wall systems, and providing useable covered outdoor areas to generate more comfortable and energy-efficient buildings.
Policy LU16.2	Landscaping. Include sustainable landscape strategies such as using deciduous trees to shade buildings in the summer and allow filtered light to penetrate during the winter, planting native and drought-tolerant shrubs, hedges, and vines to reduce water usage, utilizing permeable surfaces on walkways and outdoor spaces and vegetated swales to cleanse and infiltrate water directly onto the ground, and installing drip irrigation systems to conserve water.
Policy LU19.1	Transit-Oriented Development. Encourage projects to include a mix of transit-supportive uses, such as shops, restaurants, offices, housing, and hotels within a half mile of the Sylmar/San Fernando Metrolink Station that would serve local residents, employees, businesses, and transit commuters.
Policy LU19.3	Mixed-Use Development. Promote mixed-use projects in proximity to the Sylmar/San Fernando Metrolink Station, along transit corridors, and in identified mixed-use boulevards.
Policy LU19.4	Incentives. Utilize higher Floor Area Ratio (FAR) to incentivize mixed-use development and residential growth near the Sylmar/San Fernando Metrolink Station.
Policy LU19.5	Density. Allow higher density residential development which includes neighborhood service tenants, such as grocery stores and coffee shops, within the project site so that residents have access to everyday uses and minimize automobile trips.
Policy LU19.11	On-Street Parking. Increase on-street parking opportunities, such as angled parking, that support unique shopping experiences and calm traffic movement while providing additional parking for local businesses and services along Maclay Street.
Policy LU19.12	Local Transit Services. Promote paratransit and other local shuttle systems, and bicycle amenities that provide access for residents of adjacent neighborhoods.
Policy LU20.5	Streetscape. Support efforts to continue to improve the appearance and safety along San Fernando Road and Maclay Street through distinctive streetscapes and unified landscape treatments that prioritize pedestrians. The revitalized streets should include large deciduous shade trees punctuated by palm trees and unique street lights to help distinguish these areas. Support the development of Streetscape Plans along San Fernando Road and Maclay Street.
Policy LU20.6	Connectivity. Improve the area’s connectivity by implementing techniques to make the pedestrian environment more pleasant on longer blocks or find ways to break down the scale of these superblocks with new pedestrian connections, such as incorporating streetscape and hardscaped improvements and private easements for public use.
Policy LU20.7	Metrolink Connections. Improvements for this area should foster a connection between the Metrolink Station, railroad tracks, and the major arterial intersection of San Fernando Road. Pedestrian connections across San Fernando Road and a multi-modal transit plaza to promote transit access to and from the existing rail station is highly supported and encouraged.
Policy LU21.5	On-site Parking. Require adequate customer and employee parking be provided for all types of industrial and manufacturing facilities, and that truck traffic and parking be restricted from residential areas.
Policy LU22.3	Transitional Uses. Require transitions for industrial uses, including scale, massing, and setbacks, in those areas in close proximity to residential neighborhoods.

Table 4.2-7 Proposed Sylmar Community Plan Policies

<i>Policy No.</i>	<i>Policy</i>
Policy LU22.4	Landscaped Buffers. Incorporate landscaped buffers between the buildings and abutting properties. Methods to buffer projects should include a combination of increased setbacks, landscaping, berms and/or screening, and fencing.
Policy LU22.5	Street Beautification. Encourage streetscape improvements such as street trees, sidewalks, landscaping, lighting, and undergrounding of utilities. Projects within the two industrial parks, Telfair Avenue and Balboa Boulevard, should maintain the existing landscaped pattern.
Policy LU23.1	Environmentally Friendly Businesses. Support green business growth and encourage the replacement of polluting land use activities with environmentally friendly businesses.
Policy LU23.2	Sustainable Industry. Incentivize development opportunities for businesses that employ green or clean technologies, building practices, and processes.
Policy LU23.3	Eco-Friendly Design. Design new buildings to express the climate of Sylmar through their orientation, massing, and construction. Consider utilizing passive solar design strategies, such as overhangs and shade trees, orienting building volumes, windows, and second-stories to maximize solar access, constructing well-insulated wall systems, and providing useable covered outdoor areas to generate more comfortable and energy-efficient buildings.
Policy LU23.4	Landscaping. Include sustainable landscape strategies such as using deciduous trees to shade buildings in the summer and allow filtered light to penetrate during the winter, planting native and drought-tolerant shrubs, hedges, and vines to reduce water usage, utilizing permeable surfaces on walkways and outdoor spaces and vegetated swales to cleanse and infiltrate water directly onto the ground, and installing drip irrigation systems to conserve water.
Policy M1.1	Complete streets. Ensure the community is served by a complete street system with some streets strategically prioritized for target user(s) and other streets that connect the arterials to serve all users.
Policy M1.3	Mobility Enhancements. Design developments that increase density or intensity by zone change, variance, conditional use permit, parcel map, subdivision or other discretionary action to provide adequate mobility enhancements such as traffic mitigation, pedestrian crosswalks, trails, bicycle lanes and enhanced bus stops to ensure that mobility needs are met.
Policy M1.4	Private Investment for Off-site Facilities/Amenities. Encourage new developments to include bicycle, pedestrian, and equestrian amenities and include off-site public transit and road improvements creating a circulation system that optimizes travel by all modes.
Policy M1.5	Modified Street Standards. Where there is evidence of physical or other constraints, or uses such as a transit station, the City should consider modified street standards to implement modal priorities to enhance neighborhood character and to facilitate a complete street network.
Policy M2.1	Streetscapes. Encourage and support streetscape improvements in neighborhood areas that foster the appeal of the street as a gathering place including street furniture, well-maintained street trees and landscaping, publicly accessible courtyards, wide sidewalks, bicycle access and appropriate traffic control measures to reduce travel speeds.
Policy M2.2	Streetscape Plans. Support the development of Streetscape Plans for the following streets: <ul style="list-style-type: none"> ■ San Fernando Road between Polk Street and Hubbard Street ■ Maclay Avenue between City Boundary and Foothill Boulevard ■ Foothill Boulevard between Astoria Street and Hubbard Street ■ Polk Street between De Garmo Avenue and Dronfield Avenue
Policy M4.1	Pedestrian-Oriented Development. Encourage walking by orienting building entrances to face the streets and sidewalks when designing new developments and buildings.
Policy M4.2	Pedestrian Priority Routes. Streets within commercial, mixed-use and employment districts should have pedestrian priority, establishing pedestrian needs as paramount to vehicular circulation needs. Investment in pedestrian improvements and programs for these segments should be encouraged.

Table 4.2-7 Proposed Sylmar Community Plan Policies	
<i>Policy No.</i>	<i>Policy</i>
Policy M4.3	Pedestrian Amenities. Maintain sidewalks, streets and rights-of-way in good condition, free of obstructions, and with adequate lighting, trees and parkways. Streets must accommodate pedestrians comfortably through adequate sidewalks and parkway landscaping that provides a buffer from moving vehicles, shade from the sun, and street lighting that provides safety at night, unless specifically prescribed by the community for trails and equestrian amenities, or rural aesthetics.
Policy M4.3	Consider implementing angled parking or other parking strategies in Chatsworth Street's business core, to provide additional parking opportunities and to create a more pedestrian-friendly, environment.
Policy M5.1	Bikeway Connections. Provide bicycle access for open space areas, mixed-use corridors, commercial corridors, neighborhood districts and community centers to allow easy connection between residential neighborhoods and employment centers, as well as important nonwork destinations.
Policy M5.2	Bicycle Priority Streets. Support the Citywide bikeway network to establish bicycle circulation as paramount to vehicular circulation needs on key streets and to encourage investment in bicycle improvements and programs on these identified streets.
Policy M5.3	Public Improvements. Implement public right-of-way improvements on Eldridge Avenue, Roxford Street, and Olive View Drive and restripe sections of these streets to provide two-lanes of travel and allow for bicycle lanes on both sides of the street.
Policy M5.4	Parking Restrictions. Consider implementing parking restrictions along Bicycle Priority Streets, such as Glenoaks Boulevard, to accommodate bicycle improvements, where appropriate.
Policy M5.5	Bicycle Amenities. Incorporate bicycle amenities, such as parking, lockers, changing rooms and showers, in public facilities, parks, commercial developments, employment and transit centers, and park and ride facilities.
Policy M5.6	Regional Coordination. Coordinate with appropriate City and County agencies, adjacent jurisdictions, nonprofit organizations and the local community to require bikeways be linked with those existing and proposed in adjacent areas.
Policy M8.1	Transit Connections to Key Areas. Increase public transit access to neighborhood districts, community centers and mixed use boulevards. Coordinate with Metro and the Department of Transportation to improve local, Metro Rapid, and community-level bus service.
Policy M8.2	Development at Transit Nodes. Facilitate development and public improvements at the Sylmar/San Fernando Metrolink station and intersections that Metro identifies as major transfer nodes to promote convenient access between new development and the public transit system.
Policy M8.3	Private Transit. Encourage new major developments to provide on-demand shuttle services to the Sylmar/San Fernando Metrolink Station, local Metro bus stops, community centers, mixed use boulevards, and other destinations within the community.
Policy M9.1	Transit Priority Streets. Support the identification of transit priority street segments with high transit vehicle volumes to facilitate public transit circulation as paramount to vehicular circulation needs and to encourage investment in transit improvement programs for the identified routes.
Policy M9.2	Transit Improvements. Support the development of multi-modal transit plazas on San Fernando Road and Glenoaks Boulevard, near Hubbard Street. The closure of Truman Avenue is recommended in order to create a public plaza and improve transit connections and access.
Policy M9.3	Transit Access and Amenities. Provide enhanced amenities at major transit stops, including widened sidewalks, where possible, pedestrian waiting areas, transit shelters, enhanced lighting, improved crosswalks, information kiosks, and advanced fare collection mechanisms, shade trees, bicycle access and self-cleaning restrooms. Improve the ease and convenience of using transit by making improvements to transit waiting areas and pedestrian and bicycle routes leading to transit waiting areas.
Policy M9.4	Street Enhancements for Buses. Support street improvements, particularly along Hubbard Street, which are needed to facilitate the movement of buses, such as jog eliminations, street widening, bus bays or turnouts, street signage, striping, and colored pavement.

Table 4.2-7 Proposed Sylmar Community Plan Policies

<i>Policy No.</i>	<i>Policy</i>
Policy M9.5	Express Bus Focus. Connect express bus service, such as DASH, Commuter Express, Metro Rapid and Bus Rapid Transit, to transit centers and park and ride facilities to key destinations within Sylmar, including the Bradley industrial area, shopping centers, Mission College, and local parks.
Policy M9.6	High-Speed Rail. Conduct studies to determine the appropriate uses and amenities necessary to increase ridership, while balancing the needs of the community, if a high-speed rail station or line is planned for Sylmar.
Policy M10.1	Priorities for Capacity Enhancements. Implement a safe and efficient transportation network, and increase its capacity through, in priority order, the provision of alternative transit options (Transit), transportation demand management (TDM), and traffic system management (TSM) before considering street widening and network completion.
Policy M10.2	Motorized Vehicle Priority Streets. Support the identification of motorized vehicle streets for arterials with the highest traffic volumes and demonstrated congestion to establish motorized vehicle circulation as paramount to alternative roadway user needs and to encourage investment in congestion relief programs and/or truck safety improvements for the identified routes.
Policy M10.3	Traffic Circulation. Improve traffic circulation by either making Truman Avenue a one-way street or vacating and closing it north of Hubbard Street in order to remove the redundancy of vehicular circulation space.
Policy M10.4	Access Management. Minimize driveways and consider the addition of medians or designated right-of-way for nonmotorized traffic on Major and Secondary Highways to ensure the smooth and safe flow of vehicles, buses, pedestrians, equestrians, and bicycles.
Policy M10.5	Alley Access. Discourage the vacation and/or closure of existing public alleys in commercial districts and provide for alley access to properties fronting on Major or Secondary highways.
Policy M10.6	Emergency Access. Develop, improve, and maintain hillside streets that are easily accessible to emergency vehicles.
Policy M10.7	Coordinated Evacuation Routes. Establish a network of routes that facilitate orderly evacuation of the community in an emergency, consistent with the Emergency Management Department adopted Evacuation Plan.
Policy M11.1	Traffic Calming. Support traffic calming measures and parking management for local and collector streets where demonstrated need exists and with active community involvement, while maintaining pedestrian and bicycle circulation.
Policy M11.2	Traffic Mitigations for Development. Require major developments to mitigate traffic impacts on residential neighborhoods.
Policy M11.3	Special Event Coordination. Encourage coordination of parking ride shuttle services to activity centers and special events such as street fairs and parades.
Policy M12.1	Regional Coordination. Coordinate with Council of Government and regional transportation planning agencies (such as SCAG and METRO) and adjacent cities to improve shuttle services, encourage ride sharing, bicycle sharing, and other TDM programs within the region.
Policy M12.2	Auto Trips. Create incentives for employers, institutions, and residential neighborhoods to reduce their vehicle trips by encouraging mixed use developments that reduce the number of vehicle miles traveled.
Policy M12.3	Alternatives to the Automobile. Reduce automobile dependency by providing a safe, convenient transit system, pedestrian linkages and a network of safe and accessible bikeways and recreational trails by encouraging alternatives, including reduced emission vehicles, such as electric and neighborhood electric vehicles (NEVs).
Policy M12.4	TDM Plans. Encourage major development to submit a TDM Plan to the City and provide employee incentives for utilizing alternatives to the single-driver automobile (i.e., carpools, van pools, buses, telecommuting, bicycling, and walking, etc.)
Policy M12.5	Transportation Management Associations. Support the formation of agencies and collaboratives such as Transportation Management Associations (TMAs) that facilitate ridesharing in carpools and vanpools.
Policy M13.1	Industrial Center Siting. Site regional distribution centers and other industrial districts proximate to the freeway system, regional truck routes, and rail lines, avoiding adjacency to residential neighborhoods.

Table 4.2-7 Proposed Sylmar Community Plan Policies	
<i>Policy No.</i>	<i>Policy</i>
Policy M13.2	Goods Movement. Encourage the efficient movement of goods by rail through development of efficient intermodal freight facilities and a shift of a portion of the goods previously moved by trucks onto the rail freight system. Limit truck traffic in residential and commercial areas to designated truck routes.
Policy M13.3	Freight Rail Line. Support continued operation of the regional freight rail system, which offers safe, convenient, and economical transport of commodities.
Policy M13.4	Truck and Freight Movement. Provide appropriately designed and maintained roadways to safely accommodate truck travel and minimize the adverse impacts of freight transport on residential neighborhoods.
Policy M13.5	On-site Loading. Ensure that all commercial and industrial development have adequate off-street accommodations for loading and unloading of commercial vehicles. Minimize potential conflicts between truck loading and unloading and pedestrian, bicycle, and transit access and circulation.
Policy M14.4	Convenient Parking. Provide public parking proximate to transit centers, mixed-use boulevards, and public facilities, particularly within the Sylmar/San Fernando Road Metrolink station.
Policy M15.1	Reduced Parking near Transit Centers. Consider reductions in parking requirements for projects located within 1,500 feet of the Sylmar/San Fernando Metrolink station.
Policy M15.2	Park Once Strategy. Collaborate with the Sylmar Business Improvement Districts to improve parking services along San Fernando Road, Foothill Boulevard, and Glenoaks Boulevard, including shared-parking facilities in appropriate locations to more effectively use the overall parking supply and implement a "park once and walk" strategy for commercial districts.
Policy M15.3	Priority Parking for Alternative Fuel Vehicles. Encourage new commercial and retail developments to provide prioritized parking for shared vehicles, electric vehicles and vehicles using alternative fuels.
Policy M15.4	Connections for Electric Vehicles. Encourage new construction to include vehicle access to properly wired outdoor receptacles to accommodate zero emission vehicles (ZEVs) and/or plug-in electric hybrids (PHEV).
Policy CF5.7	Location. Encourage neighborhood parks and recreational centers near concentrations of residential areas and include safe pedestrian walkways and bicycle paths that encourage nonmotorized use.
Policy CF8.1	Urban Forest. Encourage the preservation of the existing tree population and include new trees in an effort to achieve optimum canopy cover to reduce and mitigate the heat island effect. Include on-site trees in new development projects, whenever possible.
Policy CF8.2	Tree Protection. Encourage and promote the retention of trees, particularly olive and orange trees, where practical and appropriate, through education, outreach and incentives offered by the Bureau of Street Services.
Policy CF8.3	Tree Selection. Support policies of the Bureau of Street Services to reduce conflicts with existing infrastructure through proper tree selection and through the recognition of street trees as a vital component of the City's infrastructure.
Policy CF8.5	Shade Streets. Facilitate the planting and maintenance of street trees, which provide shade and give scale to residential and commercial streets in all neighborhoods in Sylmar.
Policy CF8.6	Sustainable Design. Develop design standards that promote the sustainable development in public and private open space and street rights-of-way.
Policy CF8.7	Partnerships. Encourage community and private partnerships in urban forestry issues, minimizing maintenance costs. Collaborate with other City departments, neighborhood associations, business improvement districts and private developers to promote trees in parkways, landscaped medians, community gateways, and throughout Sylmar.
Policy CF13.5	Green Technology. Support efforts to promote the use of clean, renewable energy that is diverse in technology and location to decrease dependence on fossil fuels, reduce emissions of green house gases, and increase the reliability of the City's power supply.

Consistency Analysis

The proposed plans contain goals, policies, and programs that the City would promote during the life span of the Granada Hills–Knollwood and Sylmar Community Plans. Goals of the proposed plans are intended to promote and enhance infill, mixed-use, and transit-oriented development within the Granada Hills–Knollwood and Sylmar CPAs. The increase in density and transit opportunities will aid in the reduction of air quality emissions through the reduction in vehicle miles traveled (VMT). While the Transportation Improvement and Mitigation Monitoring Program (TIMP) for the Granada Hills–Knollwood and Sylmar Community Plans show that VMT will decrease from AQMP projected values as a result of area growth, growth projections and shifts in land use within the CPAs in conjunction with the anticipated increases in vehicle efficiencies in the future result in a reduction in criteria pollutant emissions from vehicles. The proposed plans would be consistent with the policies set forth the City’s General Plan document. Therefore, the proposed plans would be consistent with applicable guidelines and regulations.

4.2.3 Project Impacts and Mitigation

■ Analytic Method

The analysis in this section focuses on the nature and magnitude of the change in the air quality environment due to implementation of the proposed plans. Air pollutant emissions associated with the proposed plans would result from operation of the proposed development and from project-related traffic volumes. Construction activities would also generate emissions in the project area and on roadways resulting from construction-related traffic. The net increase in project site emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to thresholds of significance established by the SCAQMD.

Construction Emissions

The SCAQMD has established thresholds for the analysis of construction emissions which are published in the SCAQMD CEQA Air Quality Handbook. The construction activities associated with the proposed plans would create diesel emissions and would generate emissions of dust. Construction equipment used for development of the proposed plans would also generate VOC, CO, NO_x, SO_x, PM₁₀, and PM_{2.5} pollutants.

The predominant land use within the Granada Hills–Knollwood CPA is residential (4,639 acres and 19,213 housing units), and most of the residential land uses are single-family residences, which make up approximately 79 percent of the total housing stock. Commercial and industrial land uses constitute 200 acres and 10 acres, respectively. Including open space and facility designations, full build-out of the Granada Hills–Knollwood CPA would result in 23,801 housing units and 7,456,370 square feet (sf) of building space for nonresidential land uses. Full build-out of the proposed plan in Granada Hills–Knollwood could result in an additional 4,428 dwelling units, 7,472 people, and 5,237 new jobs.

Within the Sylmar CPA, the predominant land use is also residential with approximately 4,377 acres and 18,776 housing units. Commercial and industrial land uses constitute 218 acres and 506 acres, respectively. Including open space and facility designations, the full build-out of the Sylmar CPA would

result in 24,827 housing units and 13,438,191 sf of building space for nonresidential land uses. Full build-out of the proposed plan in Sylmar could result in an additional 6,498 dwelling units, 17,584 people, and 6,770 new jobs.

While the amount of development is known, the development will be spread out over twenty years and the phasing of the construction will be determined by market need. Therefore, the construction details would be difficult, if not impossible to quantify due to the variables associated with daily construction activity (e.g., construction schedule, number and types of equipment, etc.). Because the level of detail needed to model construction-related impacts using CalEEMod is not available, a qualitative analysis is used to project the potential significance of plan implementation with regards to construction emissions.

Operational Emissions

Operational emissions associated with the proposed plans are estimated using the CalEEMod computer model developed for California ARB and recommended by the SCAQMD the information provided in Chapter 3 (Project Description), and trip generation rates derived from the traffic report (Appendices F1 and F2). The CalEEMod program does not estimate emissions based on square footage of commercial or the majority of industrial land uses; therefore, an average floor area ratio (FAR) for each land use type was used to approximate a worst-case scenario for maximum project development. Operational emissions would be comprised of mobile source emissions and area source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the project site associated with operation of proposed development. Area source emissions are generated by natural gas consumption for space and water heating, and landscape maintenance equipment. To determine if an air quality impact would occur, the increase in emissions was compared with the SCAQMD's regional emissions thresholds.

Localized CO Concentrations for Operation

As stated previously, CO concentrations were calculated based on CALINE4 screening. This methodology assumes worst-case conditions and provides a screening of maximum, worst-case CO concentrations. For this analysis, CO concentrations for ten roadway intersections for each CPA area determined to operate at LOS of D, E or F and have the greatest traffic, at build-out were modeled and analyzed. All other roadway intersections, due to lesser congestion and traffic, are expected to generate lower CO concentrations than the intersections modeled.

Localized Sensitive Receptor Concentrations for Construction

In addition to the mass annual and daily regional thresholds, project construction has the potential to raise local ambient pollutant concentrations. This could present a significant impact if these concentrations were to exceed the AAQs included in Table 4.2-1 at receptor locations.

Localized Significance Thresholds (LSTs) were developed and adopted by the SCAQMD in response to the SCAQMD Governing Board's Environmental Justice Enhancement Initiative. LSTs are upper limits on construction-phase pollutant emissions to assure that a project would not cause or contribute to violations of the most stringent applicable federal or state ambient air quality standards; they vary based

on location of the project construction site (i.e., the specific SCAQMD-defined source-receptor area in which the site is located), size of the site, and distance of the nearest sensitive receptor to the site.

The potential for this impact is demonstrated through dispersion modeling, however for construction sites 5 acres or less a screening-level analysis based on LST lookup tables developed by SCAQMD can be used. In accordance with the SCAQMD criteria, peak daily emissions for CO, NO_x, PM₁₀, and PM_{2.5} are modeled to determine their concentration and contribution to the ambient concentrations within the project vicinity. The analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (Methodology). In accordance with the Methodology, dispersion modeling is only to include exhaust and dust emissions associated with those pieces of equipment that actually operate on-site and omits vehicle trips that are distributed over a large area. Because the level of detail needed to model construction-related impacts is not available, a qualitative analysis is used to project the potential significance of project implementation with regards to localized sensitive receptors.

Toxic Air Contaminants

The California ARB indicates that one of the highest public health priorities is the reduction of diesel particulate matter (DPM) generated by vehicles on California's highways, as it is one of the primary TACs. Other potential TAC generators within the South Coast Air Basin are associated with specific types of facilities such as dry cleaners, gas stations, distribution centers, and ports, and are the focus of California ARB's control efforts. California ARB has made specific recommendations with respect to considering existing sensitive uses when siting new TAC-emitting facilities or with respect to TAC-emitting sources when siting sensitive receptors.¹³ ARB recommends that following buffer distances be observed when locating TAC emitters or sensitive land uses:

- Freeways or major roadways—500 feet
- Dry cleaners—500 feet
- Auto body repair services—500 feet
- Gasoline dispensing stations with an annual throughput of less than 3.6 million gallons—50 feet
- Gasoline dispensing stations with an annual throughput at or above 3.6 million gallons—300 feet
- Other TAC sources including furniture manufacturing and repair services that use Methylene Chloride or other solvents identified as a TAC—300 feet
- Distribution centers with more than 100 trucks per day; more than 40 trucks with operating transport refrigeration units per day; or where transport refrigeration unit operations exceed 300 hours per week—1,000 feet
- Rail yards for major service and maintenance operations—1,000 feet
- Chrome platers—1,000 feet
- Port developments should not site the heavily impacted areas immediately upwind of sensitive land uses
- Petroleum refineries should not site the heavily impacted areas immediately upwind of sensitive land uses

¹³ California Air Resources Board, *Air Quality and Land Use Handbook—A Community Health Perspective* (April 2005).

The SCAQMD and California ARB recommend that site-specific health risk assessments be performed to accurately document potential cancer risk when siting sensitive land uses within the above buffer zones.

■ **Thresholds of Significance**

The 2006 Los Angeles CEQA Thresholds Guide defers to the SCAQMD thresholds for analysis of air quality impacts. As the agency principally responsible for comprehensive air pollution control in the Basin, the SCAQMD recommends that projects should be evaluated in terms of air pollution control thresholds established by the SCAQMD and published in the CEQA Air Quality Handbook. These thresholds were developed by the SCAQMD to provide quantifiable levels so that projects can be compared using the same standard. The City utilizes the SCAQMD's thresholds that are recommended at the time that development projects are proposed to assess the significance of quantifiable impacts. The following quantifiable thresholds are currently recommended by the SCAQMD and are used to determine the significance of air quality impacts associated with the proposed project.

Implementation of the proposed project may have a significant adverse impact on air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan
- 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 that exceed quantitative thresholds for ozone precursors)
- Expose sensitive receptors to substantial pollutant concentrations
- Create objectionable odors affecting a substantial number of people

Construction Emissions Thresholds

The SCAQMD recommends that projects with construction-related emissions that exceed any of the following emissions thresholds should be considered significant:

- 550 pounds per day of CO
- 75 pounds per day of VOC
- 100 pounds per day of NO_x
- 150 pounds per day of SO_x
- 150 pounds per day of PM₁₀
- 55 pounds per day of PM_{2.5}

Operational Emissions Thresholds

The SCAQMD recommends that projects with operational emissions that exceed any of the following emissions thresholds should be considered significant; these thresholds apply to individual development projects only; they do not apply to cumulative development:

- 550 pounds per day of CO
- 55 pounds per day of VOC
- 55 pounds per day of NO_x

- 150 pounds per day of SO_x
- 150 pounds per day of PM₁₀
- 55 pounds per day of PM_{2.5}

Cumulative Impacts

In order to assess cumulative impacts, the SCAQMD recommends that projects be evaluated to determine whether they would be consistent with 2007 AQMP performance standards and project-specific emissions thresholds. In the case of the proposed plans, air pollutant emissions would be considered to be cumulatively considerable if the new sources of emissions exceed SCAQMD project-specific emissions thresholds.

Localized Thresholds of Significance (LST)

Construction emissions LSTs are only analyzed for CO, NO₂, PM₁₀, and PM_{2.5}. Thresholds of significance for localized concentrations were developed by comparing the highest ambient air quality measurements between 2009 and 2011 (as shown in Table 4.2-1) to the most stringent air quality standards. The difference is the maximum concentration of criteria air pollutants that the proposed plans would be able to create without causing an exceedance in the ambient air quality standard. Therefore, the following LSTs apply to construction of development pursuant to the proposed plans. Table 4.2-8 (Air Quality Significance Thresholds) illustrates the PM_{2.5} and PM₁₀ maximum allowable concentrations established by California ARB, as the Basin is in nonattainment for these pollutants, and the SCAQMD-established threshold criteria to determine if a project has the potential to contribute to an exceedance of the state Ambient Air Quality Standards with respect to CO emissions from operational mobile sources.

Toxic Air Contaminants

Based on the methodology established by the Office of Environmental Health Hazard Assessment (OEHHA) and the SCAQMD, the following thresholds have been established to determine the Maximum Individual Cancer Risk (MICR), Hazard Index (HI), and cancer burden for development under the proposed plans.

- MICR—cancer risk of less than 10 in one million ($< 10 \times 10^{-6}$)
- HI—highest chronic health index of less than 1
- Cancer Burden—excess cancer burden within 1 square mile of less than 0.5

Table 4.2-8 Air Quality Significance Thresholds		
	Granada Hills-Knollwood	Sylmar
Localized Significance Thresholds		
For 1-hour CO concentrations: 20 ppm or	16 ppm maximum allowable project contribution	17 ppm maximum allowable project contribution
For 8-hour CO concentrations 9 ppm or	6.2 ppm maximum allowable project contribution	6.1 ppm maximum allowable project contribution
For 1-hour NO ₂ concentrations 0.18 ppm or	0.105 ppm maximum allowable project contribution	0.09 ppm maximum allowable project contribution
For annual NO ₂ concentrations 0.03 ppm or	0.013 ppm maximum allowable project contribution	0.003 ppm maximum allowable project contribution
For 24-hour PM _{2.5} and PM ₁₀ concentrations	10.4 µg/m ³ for 24 hour PM ₁₀ concentrations 2.5 µg/m ³ for 24 hour PM _{2.5} concentrations	10.4 µg/m ³ for 24 hour PM ₁₀ concentrations 2.5 µg/m ³ for 24 hour PM _{2.5} concentrations
CO Hotspots		
For 1-hour CO concentrations: 20 ppm or	16 ppm maximum allowable project contribution	17 ppm maximum allowable project contribution
For 8-hour CO concentrations 9 ppm or	6.2 ppm maximum allowable project contribution	6.1 ppm maximum allowable project contribution
SOURCE: SCAQMD (2012); California ARB (2012).		

■ Effects Not Found to Be Significant

There were no effects identified that would not have any impact with respect to air quality.

■ Less-Than-Significant Impacts

Impact 4.2-1 **Implementation of the proposed plans would not conflict with or obstruct implementation of the applicable air quality plan. This impact is *less than significant*.**

Granada Hills-Knollwood

The 2007 AQMP was prepared to accommodate growth, to reduce high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment, because this growth is included in the projections used to formulate the AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD’s recommended daily emissions thresholds.

Projects that are consistent with the projections of employment and population forecasts identified in RTP/SCS are considered consistent with the AQMP growth projections. In turn, projects that are consistent with the City’s General Plan are considered to be consistent with the RTP/SCS, as the General Plan forms the basis for population and employment forecasts in the RTP/SCS. This is because the RTP/SCS forms the basis of the land use and transportation control portions of the AQMP.

The Granada Hills–Knollwood CPA is currently planned for residential, commercial, and industrial land uses with an existing population of 56,696 and employment of 14,957. The proposed Granada Hills–Knollwood Community Plan, if completely built out, would result in a growth in population to 66,168 (16.71 percent increase) and employment estimate of 20,194 (35.01 percent increase). Based on SCAG’s 2030 projections, the current AQMP projects an estimated population and employment in 2030 of 65,996 and 19,997, respectively. The proposed Granada Hills–Knollwood Community Plan accommodates the forecasted growth increase anticipated in the AQMP for both population and employment. The proposed Granada Hills–Knollwood Community Plan capacity for jobs is 20,194, slightly more than the SCAG projected jobs of 19,977. Overall, employment throughout the City is consistent with SCAG projections. Accordingly, planned build-out in the City, including build-out of the CPA under the proposed Granada Hills–Knollwood Community Plan, would be consistent with SCAG’s year 2030 projections, and therefore consistent with the AQMP. In addition, VMT will also exceed those projected by the AQMP, as shown in Table 4.2-9 (Granada Hills–Knollwood Population, Employment, and VMT Estimates).

<i>Evaluation Criteria</i>	<i>AQMP Projections^a</i>	<i>2005 (Existing)</i>	<i>2030 Capacity</i>
Population	65,996	58,696	66,168
Employment	19,997	14,957	20,194
Total VMT^a	367,290	243,454	368,535

SOURCE: Atkins (2012) (calculation sheets are provided in Appendix B1).

a. VMT is arterial streets only.

In order to evaluate the total changes, an evaluation of total VMT was conducted. As shown in Table 4.2-9, overall VMT is projected to increase slightly with respect to the AQMP. However, as noted, the projections in the Granada Hills–Knollwood CPA were adjusted by the DCP to reflect redistribution into targeted growth areas; the growth forecasts for the City of Los Angeles, including Granada Hills–Knollwood and the other 34 Community Plans that comprise the Land Use Element of the General Plan, would remain consistent with the overall growth projections in the AQMP. Therefore, the increase in VMT would not conflict with the projections as provided to SCAG and the AQMP. This impact is considered *less than significant*, and no mitigation is required.

Sylmar

The Sylmar CPA is currently planned for residential, commercial, and industrial land uses with an existing population of 71,794 and employment of 19,619. The proposed Sylmar Community Plan, if completely build-out, would result in a growth in population to 89,378 and employment estimate of 26,389. Based on SCAG’s 2030 projections, the current AQMP (as shown in Table 4.2-10 [Sylmar Population, Employment, and VMT Estimations]) projects an estimated increase in population and employment of 85,993 and 25,660, respectively. The proposed Sylmar Community Plan accommodates the forecasted growth increase anticipated in the AQMP for population and employment, and overall development within the City of Los Angeles is projected to be consistent with SCAG’s year 2030 projections. The proposed Sylmar Community Plan capacity for jobs is 26,389, slightly more than the SCAG projected

jobs of 25,660. Overall, employment throughout the City is consistent with SCAG projections. Accordingly, planned build-out in the City, including build-out of the CPA under the proposed Sylmar Community Plan, would be consistent with SCAG’s year 2030 projections, and therefore consistent with the AQMP.

<i>Evaluation Criteria</i>	<i>AQMP Projections</i>	<i>2005 (Existing)</i>	<i>2030 Capacity</i>
Population	85,993	71,794	89,378
Employment	25,660	19,619	26,389
VMT ^a	351,868	164,195	344,402

SOURCE: Atkins (2012) (calculation sheets are provided in Appendix B2).
a. VMT is arterial streets only.

As shown in Table 4.2-10, although the population and employment are anticipated to increase, overall VMT is projected to decrease with respect to the AQMP. Therefore, the decrease in VMT ensures that the revised project is consistent with the projections as provided to SCAG, and the AQMP. In addition, the projections in the Sylmar Community Plan were adjusted by the DCP to reflect redistribution into targeted growth areas; the growth forecasts for the City of Los Angeles, including Sylmar and the other 34 Community Plan areas that comprise the Land Use Element of the General Plan, would remain consistent with the overall growth projections in the AQMP. This impact is considered *less than significant*, and no mitigation is required

Impact 4.2-2 Implementation of the proposed plans would not result in objectionable odors affecting a substantial number of people. This impact is *less than significant*.

Odors emanate from trace substances within the air that can be perceived by the sense of smell. This analysis focuses on objectionable odors. Although almost any land use has the potential to emit odors, some land uses are more likely to produce odors because of their operations. Land uses that are known to have the potential to emit odors include: agriculture, chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants.

Granada Hills–Knollwood

Because of the specific uses that could occur under the Granada Hills–Knollwood Community Plan, there is the potential that new development operations could emit odors. Each individual development project under the proposed plan would be required to evaluate the project with respect to odor impacts. By evaluating for potential odor impacts early in the development process, odor sources can be sited away from sensitive receptors or mitigated to a level where odors are not objectionable. Potential measures that could be implemented on a project level include locating potential odor sources downwind from existing sensitive receptors and potential sensitive receptors upwind from existing odor sources, maintaining an adequate buffer between potential odor sources and receptors such that emitted odors are dissipated before reaching the receptors (minimum of 500 feet depending on odor source), and designing odor-emitting source facilities such that odor emitters are located as far from potential receptors as

possible and stack heights are balanced to provide the maximum dispersion of odor between the stack and the nearest sensitive receptors. Appropriate measures would be considered by the City as development projects are proposed, and appropriate mitigation will be implemented on the project level. Therefore, this impact would be considered *less than significant*, and no mitigation is required on a program level.

Sylmar

Because of the specific uses that could occur under the Sylmar proposed plans, there is the potential that new development operations could emit odors. Each individual development project under the proposed plan would be required to evaluate the project with respect to odor impacts. By evaluating for potential odor impacts early in the development process, odor sources can be sited away from sensitive receptors or mitigated to a level where odors are not objectionable. Potential measures that could be implemented on a project level include locating potential odor sources downwind from existing sensitive receptors and potential sensitive receptors upwind from existing odor sources, maintaining an adequate buffer between potential odor sources and receptors such that emitted odors are dissipated before reaching the receptors (minimum of 500 feet depending on odor source), and designing odor-emitting source facilities such that odor emitters are located as far from potential receptors as possible and stack heights are balanced to provide the maximum dispersion of odor between the stack and the nearest sensitive receptors. Appropriate measures would be considered by the City as development projects are proposed, and appropriate mitigation will be implemented on the project level. Therefore, this impact would be considered *less than significant*, and no mitigation is required on a program level.

■ Significant and Unavoidable Impacts

Impact 4.2-3 **Implementation of the proposed plans could violate air quality standards or contribute substantially to an existing or projected air quality violation. Implementation of mitigation measures MM4.2-1 through MM4.2-4 would reduce this impact, but not to less than significant during construction. Therefore, this impact is *significant and unavoidable*.**

Granada Hills–Knollwood

Construction Emissions

Construction of new development under the proposed Granada Hills–Knollwood Community Plan would occur in relation to market demand between 2012 and 2030. Because market demand will fluctuate with the economy, there is no construction schedule in place for the development anticipated under the proposed plans. Construction emissions are dependent on the number of construction and delivery vehicles operating, the length of time in operation, and the amount of soil that is disturbed on a daily basis. Without a known schedule or an anticipated annual or daily level of construction, emissions cannot be accurately estimated.

Individual discretionary development projects under the proposed plans will be required to analyze the impacts from construction activities and to implement all feasible and appropriate mitigation to reduce project-specific impacts to below regulatory thresholds. Due to the unknown level of construction

activity that would occur on any given day during plan build-out, this is considered a potentially significant impact. Implementation of standard City mitigation measures and code compliance would reduce this impact, but not necessarily to a less-than-significant level. Individual development projects could, even with implementation of mitigation, result in an air quality violation or a substantial contribution to an existing air quality violation. Emissions would be anticipated to be lower during years where the area is experiencing an economic slowdown and higher during years where the economic situation is at peak. It is anticipated that the daily average emissions (between existing and 2030) would exceed the SCAQMD’s recommended thresholds for construction emissions, although individual years (and months and days) would vary substantially over the planning horizon. Therefore, this would be a **significant and unavoidable** impact for construction activities on a program level.

Operational Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities within the proposed plan area. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, and the operation of landscape maintenance equipment. Mobile emissions would be generated by the motor vehicles traveling to, within, and from the CPA.

Operational emissions are identified in Table 4.2-11 (Granada Hills–Knollwood Daily Operational Emissions). As shown, operational emissions, without the incorporation of mitigation, would result in significant impacts for ROG, PM₁₀ and PM_{2.5}. Growth projections and shifts in land use within the CPA, in conjunction with the anticipated increases in vehicle efficiencies, would result in a reduction in criteria pollutant emissions from vehicles even though there is an increase in vehicle use and VMT.

Table 4.2-11 Granada Hills–Knollwood Daily Operational Emissions					
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Existing					
Area	3,010	328	8,315	1,041	1,040
Mobile	2,438	5,346	23,018	1,997	223
Total	5,448	5,674	31,333	3,038	1,264
Total 2030 Unmitigated					
Area	3,552	373	9,590	1,240	1,240
Mobile	786	1,818	6,027	2,602	142
Total	4,339	2,190	15,617	3,842	1,381
2030 Growth					
Area	542	45	1,275	199	199
Mobile	(1,651)	(3,528)	(16,991)	605	(82)
Total	(1,109)	(3,484)	(15,715)	804	117
SCAQMD Thresholds	55	55	550	150	55
Significant?	No	No	No	Yes	Yes

SOURCE: Atkins (2012) (calculation sheets are provided in Appendix B1).

The proposed plan would provide for infill development in an already established suburban area, which would result in the reduction of trips from the existing transit and pedestrian amenities. Reductions from these features were included in the traffic data provided by Iteris and have been incorporated into the emissions in Table 4.2-11. Implementation of the proposed plan policies would reduce ROG, PM₁₀, and PM_{2.5} emissions by implementing green building policies and reducing VMT generated by projected growth. Community Plan policies provide that developments should be sustainable, attractive, and incorporate green building design, systems, and materials to the greatest extent feasible, provide for the development of a multi-modal center that considers various modes, such as walking, cycling, automobile, public transit, etc, and promote sustainable practices by reducing long-distance shipping and co-locating neighborhood services in schools, community centers, and other public facilities and around transit centers. For example, Policy LU5.1 (also Policy LU5.3 and Policy LU5.4) provides that developments should be sustainable, attractive, and incorporate green building design, systems, and materials to the greatest extent feasible. Policies LU15.3, LU18.2, and M4.1 through M4.3 encourage pedestrian and bicycle travel through the addition of amenities and such as awnings, plazas, courtyards, bicycle parking areas, and building access from the sidewalk. These policies would reduce impacts from implementation of the proposed plan.

All individual projects developed under the proposed plan would require the incorporation of mitigation measures to reduce air quality impacts. While the implementation of these measures will reduce air quality impacts, build-out of the proposed plans would result in vehicle and area emissions that would exceed the SCAQMD's daily thresholds for ROG, PM₁₀ and PM_{2.5}. Therefore, this would remain a ***significant and unavoidable*** impact with respect to ROG, PM₁₀ and PM_{2.5}.

Sylmar

Construction Emissions

Construction of new development under the proposed Sylmar Community Plan would occur in relation to market demands between 2012 and 2030. Because market demand will fluctuate with the economy, there is no construction schedule in place for the development anticipated under the proposed plans. Construction emissions are dependent on the number of construction and delivery vehicles operating, the length of time in operation, and the amount of soil that is disturbed on a daily basis. Without a known schedule or an anticipated annual or daily level of construction, emissions cannot be accurately estimated.

Individual discretionary development projects under the proposed plans will be required to analyze the impacts from construction activities and to implement all feasible and appropriate mitigation to reduce project-specific impacts to below regulatory thresholds. Due to the unknown level of construction activity that would occur on any given day during plan build-out, this is considered a potentially significant impact. Implementation of standard City mitigation measures and code compliance would reduce this impact, but not necessarily to a less-than-significant level. Individual development projects could, even with implementation of mitigation, result in an air quality violation or a substantial contribution to an existing air quality violation. Emissions would be anticipated to be lower during years where the area is experiencing an economic slowdown and higher during years where the economic situation is at peak. It is anticipated that the daily average emissions (between existing and 2030) would

exceed the SCAQMD’s recommended thresholds for construction emissions, although individual years (and months and days) would vary substantially over the planning horizon. Therefore, this would be a **significant and unavoidable** impact for construction activities on a program level.

Operational Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities within the proposed plan area. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, and the operation of landscape maintenance equipment. Mobile emissions would be generated by the motor vehicles traveling to, within, and from the CPA.

Operational emissions are identified in Table 4.2-12 (Sylmar Daily Operational Emissions). As shown, operational emissions, without the incorporation of mitigation would result in significant impacts for ROG, PM₁₀ and PM_{2.5}. Growth projections and shifts in land use within the CPA, in conjunction with the anticipated increases in vehicle efficiencies, would result in a reduction in criteria pollutant emissions from vehicles even though there is an increase in vehicle use and VMT.

Table 4.2-12 Sylmar Daily Operational Emissions					
	<i>ROG</i>	<i>NO_x</i>	<i>CO</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>
Existing					
Area	2,597	286	6,683	836	836
Mobile	2,469	5,370	23,241	1,998	224
<i>Total</i>	<i>5,066</i>	<i>5,656</i>	<i>29,924</i>	<i>2,834</i>	<i>1,059</i>
Total 2030 Unmitigated					
Area	3,694	376	9,749	1,259	1,259
Mobile	857	1,984	6,560	2,819	153
<i>Total</i>	<i>4,551</i>	<i>2,359</i>	<i>16,309</i>	<i>4,078</i>	<i>1,413</i>
2030 Growth					
Area	1,097	89	3,067	424	423
Mobile	(1,613)	(3,386)	(16,681)	820	(70)
<i>Total</i>	<i>(516)</i>	<i>(3,297)</i>	<i>(13,614)</i>	<i>1,244</i>	<i>353</i>
SCAQMD Thresholds	55	55	550	150	55
Significant?	No	No	No	Yes	Yes
SOURCE: Atkins (2012) (calculation sheets are provided in Appendix B2).					

The proposed plan would provide for infill development in an already established suburban area, which would result in the reduction of trips from the existing transit and pedestrian amenities. Reductions from these features were included in the traffic data provided by Iteris and have been incorporated into the emissions in Table 4.2-12. Implementation of the proposed plan policies would reduce ROG, PM₁₀, and PM_{2.5} emissions by implementing green building policies and reducing VMT generated by projected growth that result in more sustainable communities. For example, Policies LU7.1, LU7.3, and LU16.1

provide for sustainable, attractive, and green building design, systems, and materials within the developments. Pedestrian, equestrian and bicycle travel are encouraged through Policies LU10.2, LU14.3, LU15.7, M4.1, and M5.1 through M5.3 through the addition of amenities. These policies, along with others identified would reduce impacts from implementation of the proposed plan.

All individual projects developed under the proposed plan would require the incorporation of mitigation measures to reduce air quality impacts. While the implementation of these measures will reduce air quality impacts, build-out of the proposed plans would result in vehicle and area emissions that would exceed the SCAQMD's daily thresholds for ROG, PM₁₀, and PM_{2.5}. Therefore, this would remain a *significant and unavoidable* impact with respect to ROG, PM₁₀, and PM_{2.5}.

Impact 4.2-4 **Implementation of the proposed plans could 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 that exceed quantitative thresholds for ozone precursors). Implementation of mitigation measures MM4.2-1 through MM4.2-3 would reduce this impact, but not to a less-than-significant level. Therefore, this cumulative impact is *significant and unavoidable*.**

Granada Hills–Knollwood

The South Coast Air Basin (Basin) is designated as a federal level severe nonattainment area for ozone, meaning that federal ambient air quality standards are not expected to be met for more than 18 years, and as nonattainment areas for PM₁₀ and PM_{2.5}. The Basin is a state-level extreme nonattainment area for ozone, and is a state-level nonattainment area for PM₁₀ and PM_{2.5}.¹⁴ As indicated under Impact 4.2-3, emissions from operational activities are anticipated to exceed the operational threshold for ROG, PM₁₀, and PM_{2.5} emissions before mitigation. Because emissions from the proposed plan areas would be significant on a project level, and the Basin is in nonattainment for PM₁₀ and PM_{2.5}, this is considered to be a potentially significant cumulative impact. Implementation of mitigation measures MM4.2-1 through MM4.2-3 would reduce these impacts. The impacts from ROG and PM_{2.5} emissions would be reduced to below regulatory thresholds; however, PM₁₀ emissions would still exceed the 150 lbs/day regulatory threshold. Because the project exceeds a threshold for a standard that the Basin is in nonattainment, the project would make a cumulatively considerable contribution to the cumulative impact. Because all exceedances of project level thresholds inhibit the Basin's ability to reach attainment, any exceedance is considered a *significant and unavoidable* cumulative impact.

Sylmar

The South Coast Air Basin (Basin) is designated as a federal level severe nonattainment area for ozone, meaning that federal ambient air quality standards are not expected to be met for more than 18 years, and as nonattainment areas for PM₁₀ and PM_{2.5}. The Basin is a state-level extreme nonattainment area for

¹⁴ California Air Resources Board, Area Designations Activities and Maps (last reviewed September 2011), <http://www.arb.ca.gov/desig/changes.htm#summaries> (accessed June 4, 2012); U.S. Environmental Protection Agency, *The Green Book Nonattainment Areas for Criteria Pollutants* (updated March 30, 2012), <http://www.epa.gov/air/oaqps/greenbk/index.html> (accessed June 4, 2012).

ozone, and is a state-level nonattainment area for PM₁₀ and PM_{2.5}.¹⁵ As indicated under Impact 4.2-3, emissions from operational activities are anticipated to exceed the operational threshold for ROG, PM₁₀, and PM_{2.5} emissions before mitigation. Because emissions from the proposed plan areas would be significant on a project level, and the Basin is in nonattainment for PM₁₀ and PM_{2.5}, this is considered to be a potentially significant cumulative impact. Implementation of mitigation measures MM4.2-1 through MM4.2-3 would reduce these impacts. The impacts from ROG and PM_{2.5} emissions would be reduced to below regulatory thresholds; however, PM₁₀ emissions would still exceed the 150 lbs/day regulatory threshold. Because the project exceeds a threshold for a standard that the Basin is in nonattainment, the project would make a cumulatively considerable contribution to the cumulative impact. Because all exceedances of project-level thresholds inhibit the Basin's ability to reach attainment, any exceedance is considered a *significant and unavoidable* cumulative impact.

Impact 4.2-5 **Implementation of the proposed plans could expose sensitive receptors to substantial pollutant concentrations. Implementation of project-level mitigation measures MM4.2-1 through MM4.2-3 would reduce this impact, but not to a less-than-significant level for exceedance of LST thresholds during construction. Therefore, this impact is *significant and unavoidable*.**

Granada Hills–Knollwood

LST Analysis

LSTs have been developed by the SCAQMD to determine maximum allowable concentrations of criteria air pollutants for projects. Construction emissions are dependent on the number of construction and delivery vehicles operating, the length of time in operation, and the amount of soil that is disturbed on a daily basis. Without a known schedule or an anticipated annual or daily level of construction, emissions cannot be accurately estimated.

Construction activities for each development project under the proposed plan will be required to conduct an LST analysis with respect to CO, NO₂, PM₁₀, and PM_{2.5} emissions. Due to the unknown level of construction activity that would occur on any given day during proposed plan build-out, and the location of construction with respect to sensitive receptors, this is considered a potentially significant impact. Implementation of the standard code requirements, SCAQMD's Best Available Control Measures (BACMs) (included in Appendix B), and project-level mitigation measures would reduce this impact. Development under the Granada Hills–Knollwood proposed plan would require an LST analysis to determine the localized impacts to sensitive receptors. However, individual projects, even with implementation of the identified mitigation, could exceed LST thresholds. Therefore, this would be a *significant and unavoidable* impact for construction activities.

¹⁵ California Air Resources Board, Area Designations Activities and Maps (last reviewed September 2011), <http://www.arb.ca.gov/design/changes.htm#summaries> (accessed June 4, 2012); U.S. Environmental Protection Agency, *The Green Book Nonattainment Areas for Criteria Pollutants* (updated March 30, 2012), <http://www.epa.gov/air/oaqps/greenbk/index.html> (accessed June 4, 2012).

CO Hotspot Analysis

Maximum existing CO concentrations were calculated for ten of the intersections within the Granada Hills–Knollwood CPA that would be affected by project-related traffic at build-out. These intersections represent the lowest levels of service and the most daily traffic as determined from the traffic report prepared by Iteris (Appendix F1). As all other intersections are expected to operate at a better LOS, those intersections would produce lower CO concentrations. The results of these calculations are presented in Table 4.2-13 (Granada Hills–Knollwood Existing Localized Carbon Monoxide Concentrations). As shown, no intersection currently exceeds national or state standards for 1-hour or 8-hour CO concentrations. Therefore, CO hotspots would not occur in the Granada Hills–Knollwood CPA as a result of plan implementation. This impact is considered *less than significant*, and no mitigation is required.

Table 4.2-13 Granada Hills–Knollwood Existing Localized Carbon Monoxide Concentrations

Intersection	Level of Service	Peak Hour Volume	1-Hr Conc. (ppm)	8-Hr Conc. (ppm)	Exceeds Standard?
State Standards	—	—	20	9	—
Balboa Blvd / Balboa Rd	F	6,510	4.8	3.4	No
Balboa Blvd / Senson Blvd	F	6,117	4.8	3.4	No
Balboa Blvd / Woodley Ave	F	6,050	4.8	3.4	No
Zelzah Ave/ Chatsworth St	F	4,210	4.6	3.2	No
Balboa Blvd / Rinaldi St	F	7,949	4.9	3.4	No
Balboa Blvd / Index St	F	4,296	4.6	3.2	No
Balboa Blvd / San Fern. Mission	F	5,573	4.6	3.2	No
Balboa Blvd / Chatsworth St	F	5,122	4.6	3.2	No
Balboa Blvd / Devonshire St	F	4,956	4.6	3.2	No
Woodley Ave / Chatsworth St	F	4,332	4.6	3.2	No

SOURCE: Atkins (2012) (calculation sheets are provided in Appendix B1).

- a. National 1-hour standard is 35.0 parts per million. State 1-hour standard is 20.0 parts per million.
- b. National 8-hour standard is 9.0 parts per million. State 8-hour standard is 9.0 parts per million.
- c. Data for the 1-hour concentration was taken from the highest peak hour result, AM Peak hour or PM Peak Hour, whichever is greater.

TAC Analysis

Diesel particulate matter, a carcinogen, is also a component of exhaust. However, construction of individual development projects pursuant to the proposed plans would be short-term in nature. Estimation of the cancer risk from diesel particulate matter assumes long-term exposure of the pollutant. Therefore, the health risk from air pollutants generated during construction is anticipated to be less than significant.

Toxic air contaminants of potential concern within the Granada Hills–Knollwood CPA include diesel particulate matter, a form of PM₁₀ and PM_{2.5} emitted mostly from diesel-powered equipment during

construction activities, and chemicals emitted from the industrial uses within the City. Individual projects that could result from the implementation of the proposed plans are unknown; therefore, pollutant sources cannot be identified, nor emissions quantified.

Operational activities under the proposed plan may include the implementation of industrial processes that would emit TACs or the siting of sensitive receptors in the vicinity of existing TAC emitters. This is considered a potentially significant impact. However, implementation of mitigation measures MM4.2-1 through MM4.2-3 would reduce this impact to a *less-than-significant* level.

Sylmar

LST Analysis

LSTs have been developed by the SCAQMD to determine maximum allowable concentrations of criteria air pollutants for projects. Construction emissions are dependent on the number of construction and delivery vehicles operating, the length of time in operation, and the amount of soil that is disturbed on a daily basis. Without a known schedule or an anticipated annual or daily level of construction, emissions cannot be accurately estimated.

Construction activities for each development project under the proposed plan will be required to conduct an LST analysis with respect to CO, NO₂, PM₁₀, and PM_{2.5}, emissions. Due to the unknown level of construction activity that would occur on any given day during proposed plans build-out, and the location of construction with respect to sensitive receptors, this is considered a potentially significant impact. Implementation of the standard code requirements, SCAQMD's BACMs (included in Appendix B2), and project-level mitigation measures would reduce this impact. Development under the Sylmar proposed plan would require an LST analysis to determine the localized impacts to sensitive receptors. However, individual projects, even with implementation of the identified mitigation, could exceed LST thresholds. Therefore, this would be a *significant and unavoidable* impact for construction activities.

CO Hotspot Analysis

Maximum existing CO concentrations were calculated for ten of the intersections within the Sylmar CPA that would be affected by project-related traffic at build-out. These intersections represent the lowest levels of service and the most daily traffic as determined from the traffic report prepared by Iteris (Appendix F2). As all other intersections are expected to operate at a better LOS, those intersections would produce lower CO concentrations. The results of these calculations are presented in Table 4.2-14 (Sylmar Existing Localized Carbon Monoxide Concentrations). As shown, no intersection currently exceeds national or state standards for 1-hour or 8-hour CO concentrations. Therefore, CO hotspots would not occur in the Sylmar CPA as a result of plan implementation. This impact is considered *less than significant*, and no mitigation is required

Table 4.2-14 Sylmar Existing Localized Carbon Monoxide Concentrations

<i>Intersection</i>	<i>Level of Service</i>	<i>Peak Hour Volume</i>	<i>1-Hr Conc. (ppm)</i>	<i>8-Hr Conc. (ppm)</i>	<i>Exceeds Standard?</i>
State Standards	—	—	20	9	—
San Fernando Rd/ Tyler St	F	2,761	3.4	3.2	No
San Fernando Rd/ Polk St	F	3,591	3.5	3.3	No
San Fernando Rd / Astoria St	F	2,981	3.5	3.3	No
Foothill Blvd / Balboa Blvd	F	4,939	3.6	3.3	No
Foothill Blvd / Yarnell St	F	3,682	3.5	3.3	No
Foothill Blvd / Sayer St	F	4,539	3.6	3.3	No
Foothill Blvd / Hubbard St	F	5,280	3.6	3.3	No
Foothill Blvd / Maclay St	F	4,784	3.6	3.3	No
Foothill Blvd / Roxford St	F	3,155	3.4	3.2	No
Foothill Blvd / Astoria St	F	4,455	3.6	3.3	No

SOURCE: Atkins (2012) (calculation sheets are provided in Appendix B2).

a. National 1-hour standard is 35.0 parts per million. State 1-hour standard is 20.0 parts per million.

b. National 8-hour standard is 9.0 parts per million. State 8-hour standard is 9.0 parts per million.

c. Data for the 1-hour concentration was taken from the highest peak hour result, AM peak hour or PM peak hour, whichever is greater.

TAC Analysis

Diesel particulate matter, a carcinogen, is also a component of exhaust. However, construction of individual development projects pursuant to the proposed plans would be short-term in nature. Estimation of the cancer risk from diesel particulate matter assumes long-term exposure of the pollutant. Therefore, the health risk from air pollutants generated during construction is anticipated to be less than significant.

Toxic air contaminants of potential concern within the Sylmar CPA include diesel particulate matter, a form of PM₁₀ and PM_{2.5} emitted mostly from diesel-powered equipment during construction activities, and chemicals emitted from the industrial uses within the City. Individual projects that could result from the implementation of the proposed plans are unknown; therefore, pollutant sources cannot be identified, nor emissions quantified.

Operational activities under the proposed plan may include the implementation of industrial processes that would emit TACs or the siting of sensitive receptors in the vicinity of existing TAC emitters. This is considered a potentially significant impact. However, implementation of mitigation measures MM4.2-1 through MM4.2-3 would reduce this impact to a *less-than-significant* level.

Mitigation Measures

As discussed previously, the proposed plans incorporate sustainable policies and programs that would help mitigate significant impacts on regional and local air quality. In addition, the following mitigation

measures shall be implemented for all discretionary projects in the Granada Hills–Knollwood and Sylmar CPAs:

- MM4.2-1 The City, as a condition of approval of all applicable discretionary projects, shall require contractors building projects within the Granada Hills–Knollwood and Sylmar CPAs to:*
- *Use properly tuned and maintained equipment. Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations*
 - *Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g., engine catalyts) to the extent they are readily available and feasible*
 - *Use heavy duty diesel-fueled equipment that uses low NO_x diesel fuel to the extent it is readily available and feasible*
 - *Use construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible*
 - *Maintain construction equipment in good operating condition to minimize air pollutants*
 - *Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic*
- MM4.2-2 In the event that future projects under the proposed Granada Hills–Knollwood and Sylmar Community Plans cover areas greater than 5 acres, appropriate analysis and modeling would be required for CO, NO_x, PM₁₀, and PM_{2.5}.*
- MM4.2-3 In order to comply with the California Air Resources Board Air Quality and Land Use Handbook (June 2005) and achieve an acceptable interior air quality level for sensitive receptors, appropriate measures shall be incorporated into discretionary project building design.*
- MM4.2-4 The City, as a condition of approval for all discretionary projects, shall require developers to implement applicable Greenhouse Gas reduction measures in project design and comply with regulatory targets.*

■ Level of Significance After Mitigation

Mitigation measures identified above and standard conditions of approval would reduce impacts to air quality during construction, but **significant and unavoidable** impacts would remain during construction if significance thresholds are exceeded.

4.2.4 Cumulative Impacts

In order to assess cumulative impacts, the SCAQMD recommends that projects be evaluated to determine whether they would be consistent with 2007 AQMP performance standards and project-specific emissions thresholds. In the case of the proposed plans, air pollutant emissions would be considered to be cumulatively considerable if the new sources of emissions exceed SCAQMD project-specific emissions thresholds. The cumulative context for consideration of most air quality impacts is the South Coast Air Basin; the context for localized significance thresholds and CO hotspot analysis would be the CPA.

The 2007 AQMP anticipates and accounts for growth within the South Coast Air Basin through 2030, and anticipates a 26.8 percent increase in vehicle trips. Future growth that does not exceed this

percentage would not conflict with the AQMP. As discussed under Impact 4.2-1, in order to evaluate the total changes anticipated under the proposed plans, an evaluation of total VMT was conducted. The combined VMT under the proposed Granada Hills–Knollwood and Sylmar Community Plans result in a decrease from what was anticipated in the 2007 AQMP for growth between 2005 and 2030. Although there is an increase in area population and employment over what was projected in the 2007 AQMP, the decrease in VMT ensures that the proposed plans are consistent with the projections as provided to SCAG. Because VMT is anticipated to reduce as a whole over the next several years due to an increased emphasis on transportation-oriented development, and the limited increase in anticipated VMT from build-out of the proposed plans, the projects would not make a cumulatively considerable contribution, and the cumulative impact is *less than significant*.

The South Coast Air Basin (Basin) is designated as a federal-level severe nonattainment area for ozone, meaning that federal ambient air quality standards are not expected to be met for more than 18 years, and as nonattainment areas for PM₁₀ and PM_{2.5}. The Basin is a state-level extreme nonattainment area for ozone, and is a state-level nonattainment area for PM_{2.5} and PM₁₀.¹⁶ As indicated under Impact 4.2-3, emissions from operational activities are anticipated to exceed the operational threshold for ROG, PM₁₀ and PM_{2.5} emissions before mitigation. Because emissions from the proposed plans' areas would be significant on a project level, and the Basin is in nonattainment for PM₁₀ and PM_{2.5}, this is considered to be a potentially significant cumulative impact. Implementation of measures MM4.2-1 through MM4.2-4 would reduce these impacts. The impacts from ROG and PM_{2.5} emissions would be reduced to below regulatory thresholds; however PM₁₀ emissions would still exceed the 150 lbs/day regulatory threshold. Because the proposed plans exceed a threshold for a standard that the Basin is in nonattainment, the project would make a cumulatively considerable contribution to the cumulative impact. Because all exceedances of project-level thresholds inhibit the Basin's ability to reach attainment, any exceedance is considered a *significant and unavoidable* cumulative impact.

As discussed in the Local Air Quality portion of Section 4.2.1, no intersection within either the Granada Hills–Knollwood or Sylmar CPA currently exceeds national or state standards for 1-hour or 8-hour CO concentrations. Therefore, there is no impact with respect to localized CO concentrations. As discussed in Impact 4.2-5, as the proposed plans' areas are built out, the level of service on roadways has the potential to deteriorate; however, no intersection would exceed national or state standards for 1-hour or 8-hour CO concentrations. Therefore, the project would not make a cumulatively considerable contribution to CO hotspots.

The SCAQMD provides a detailed analysis of existing TAC health risks within the District that indicates existing cancer risk within the CPA is between 603 and 2117 cases in a million. Operational activities under the proposed plans may include the implementation of industrial processes that will emit TACs or the siting of sensitive receptors in the vicinity of existing TAC emitters. The potential increase in TAC emissions would result in a cumulatively considerable contribution to TAC impacts. However, implementation of mitigation measures MM4.2-1 through MM4.2-4, the project in combination with future development would result in a *less-than-significant* cumulative impact.

¹⁶ California Air Resources Board, Area Designations Map/State and National (last reviewed September 2010), <http://www.arb.ca.gov/desig/adm/adm.htm> (accessed January 13, 2011).

Construction activities have the potential to impact nearby sensitive receptors. Because construction activities are of limited duration and in a limited area it is unlikely that construction being undertaken now would overlap with construction under the proposed plans. However, without a known schedule or an anticipated annual or daily level of construction for the proposed plans' build-out, timing and emission levels cannot be accurately estimated. Therefore, construction for the proposed plans is considered a potentially significant impact on the project level. Implementation of the standard code requirements CR-1 through CR-3, SCAQMD's BACM's (included in Appendix B), and measures MM4.2-1 through MM4.2-4 would reduce this impact, but not necessarily to a less-than-significant level. Because the timing and extent of current construction's overlap with nearby construction under the proposed plans' areas is unknown, construction activities would make a cumulatively considerable contribution to the plans' cumulative impact. Because the SCAQMD indicates that projects that are significant at a project level must also be determined to be significant at a cumulative level, this would result in a ***significant and unavoidable*** cumulative impact.

There are existing land uses within the CPAs that have the potential to emit odors. As indicated under Impact 4.2-2, because of the unknown disposition of the developable land under the proposed plan, there is the potential that new development operations will emit odors that could be objectionable and could be in close proximity to existing odor sources. Therefore, the proposed plans have the potential to result in a cumulative impact, and because the exact disposition of land uses is unknown, would result in a cumulatively considerable contribution to the plans' cumulative impact. Each individual development project under the proposed plans will be required to evaluate the project with respect to odor impacts. By evaluating for potential odor impacts early in the development process, odor sources can be sited away from sensitive receptors or mitigated to a level where odors are not objectionable. Because odors are localized impacts and the siting of new odor sources as well as sensitive receptors will be evaluated and mitigated such that no localized odor impacts occur, this project would result in a ***less-than-significant*** cumulative impact.

4.2.5 References

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