



South Coast Air Quality Management District

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**Draft Environmental Impact Report (DEIR) for the
9000 Airport Boulevard Project (Proposed Project)
(SCH No: 2024080852)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the DEIR

Based on the DEIR, the Proposed Project would demolish approximately 37,860 square feet of existing commercial/industrial uses and associated parking to develop an industrial center on an approximately 18-acre site, with up to 435,390 square feet of industrial uses. The project would also include up to 10,000 square feet of refrigerated warehousing space, with approximately eight trucks equipped with TRUs. A review of aerial imagery indicates that the nearest sensitive receptor, residential uses, is located approximately 80 feet north of the Project Site, across Interceptor Street. Construction is anticipated to begin in 2026 and continue for approximately 17 months. Two development options are proposed:

Option 1: A single building with up to 355,390 square feet of warehouse space and 80,000 square feet of ancillary office space, totaling 435,390 square feet of floor area, with a maximum height of 50 feet. This option includes 90 truck trailer parking spaces, 274 passenger vehicle parking spaces, and approximately 93,100 square feet of landscaped area. It is estimated that Option 1 would generate 585 truck trips per day during operation.

Option 2: Three buildings with up to 320,056 square feet of warehouse space and 90,000 square feet of ancillary office space, totaling 410,056 square feet of floor area, with a maximum height of 46 feet. This option includes 369 passenger vehicle parking spaces and approximately 120,400 square feet of landscaped area. It is estimated that Option 2 would generate 527 truck trips per day during operation.

South Coast AQMD Comments*Assessment of TRU Idling Durations and Potential Health Impacts from the Proposed Project Site*

Based on South Coast AQMD reviews of the modeling files and information provided in Appendix C of the DEIR, the duration for on-site TRU truck idling in the Proposed Project site is assumed to be 15 minutes. According to the California Air Resource Board (CARB)'s Proposed Amendments to the Airborne Toxic Control Measure (ATCM) for In-Use Diesel-Fueled TRUs, a TRU-equipped vehicle enters the facility fully loaded (inbound) and exits the facility fully loaded (outbound), with each loading and unloading process taking 2 hours, totaling up to 4 hours. Given this, the loading and unloading of goods during a single visit can result in up to 4 hours of idling on-site. The 15-minute assumption for the TRU idling duration is not supported by substantial evidence and likely underestimated the potential exposure of nearby residents to diesel exhaust emissions, which could pose a significant cancer risk to the community. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the Project's HRA to reflect a reasonable TRU idling duration supported by substantial evidence.

Enforceability of Composite Haul Truck Assumptions

Appendix C of the DEIR identifies Vulcan Irwindale Landfill (approximately 30 miles from the Project site) and SoilClean Adelanto Landfill (approximately 99 miles from the Project site)¹ as the disposal facilities that would serve the Proposed Project. The DEIR further assumes that no more than 10 percent of the daily haul trucks would travel to the SoilClean Adelanto Landfill and uses a composite haul-truck mileage assumption in its analysis based on this distribution. However, the DEIR does not identify any enforceable mechanism to ensure compliance with this 10 percent limitation on daily trips.

To maintain the consistency between the impact analysis and the Project implementation, South Coast AQMD staff recommends that the Lead Agency include this limitation as a project design feature or mitigation measure.

Underestimation of Ground-Level Pollutants Near Buildings in Health Risk Assessment (HRA) for Option 2 of the Proposed Project

South Coast AQMD staff's review of the modeling files noted that buildings under Option 2 were not included in the building downwash analysis in the AERMOD dispersion model for operation HRA which may result in an underestimation of the ground-level pollutant concentrations near the buildings. Thus, the Lead Agency is recommended to: 1) include all buildings in the building downwash analysis for Option 2 to analyze more accurate ground-level concentrations; and 2) present the revised HRA results in the Final EIR.

¹ DEIR-Appendix C-1.2-Air Quality Worksheets.

Health Risk Assessment Recalculation and Emission Reductions from Health Risk Strategies

According to the DEIR, the maximum off-site individual cancer risk is reported as 8.3 in one million under Option 1 and 5.6 in one million under Option 2 for residences located directly east of the Project site. However, based on South Coast AQMD staff's screening-level calculations and re-assessment using the actual emission rates, the maximum off-site individual cancer risk may exceed South Coast AQMD's significance threshold of 10 in one million and could reasonably fall within a range above 10 and potentially exceeding 20 in one million if including the building downwash effects for both Option 1 and Option 2.

Therefore, South Coast AQMD's staff recommends that Lead Agency incorporate the following mitigation measures and project design considerations and reevaluate the health risk assessment using correct and revised analyses into the Final EIR:

Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.

3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act²
2. South Coast AQMD 2022 Air Quality Management Plan,³ specifically:
 - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - b) Appendix IV-B – CARB’s Strategy for South Coast
 - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.⁴

South Coast AQMD Air Permits and Role as a Responsible Agency

² State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>.

³ South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

⁴ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution>.

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,⁵ Rule 203 – Permit to Operate,⁶ Rule 401 – Visible Emissions,⁷ Rule 402 – Nuisance,⁸ Rule 403 – Fugitive Dust,⁹ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁰ Rule 1113 – Architectural Coatings,¹¹ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹² Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹³ and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹⁴ etc.

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the

⁵ South Coast AQMD, Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁶ South Coast AQMD, Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

⁷ South Coast AQMD, Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-401.pdf>

⁸ South Coast AQMD, Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-402.pdf>

⁹ South Coast AQMD, Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-403>

¹⁰ South Coast AQMD, Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹¹ South Coast AQMD, Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹² South Coast AQMD, Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹³ South Coast AQMD, Rule 1466 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

¹⁴ South Coast AQMD, Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

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SW:JA

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