



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Subsequent Environmental Impact Report (SEIR) for the
Los Angeles County General Hospital Campus Master Plan (Proposed Project)
(SCH No.: 2014051061)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The County of Los Angeles Department of Economic Opportunity is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

Summary of Project Information in the Draft SEIR

Based on the Draft SEIR, the Proposed Project involves development within approximately 30.8 acres of the 81.9-acre Project Site located at 1200 State Street.¹ The Proposed Project would include up to 3,200 residential units, 450 hospital beds, 200 patient and caregiver lodging rooms, 8,588 parking spaces, 735,300 square feet (sf) of medical office space, 400,000 sf of general office space, 320,000 sf of retail uses, 350,000 sf of community facilities, 110,000 sf of educational facilities, 160,000 sf of warehouse/storage facilities, and 200,000 sf of clean technology/light industrial uses, totaling approximately 8,060,978 sf of new development.² The Proposed Project would be organized into three conceptual development hubs: the Commerce Hub, the Historic Hub, and the Medical Hub, which would be interconnected by three conceptual corridors.³ The community facilities, clean technology/light industrial uses, medical office, general office, and hospital components were previously approved under the 2014 master Plan (referred to as the LAC+USC Medical Center Master Plan) but have not been implemented to date. These previously approved land uses have been carried forward and incorporated into the Draft SEIR.⁴

In addition, the Proposed Project would include the adaptive reuse of approximately 1.2 million sf within the Los Angeles General Hospital - Acute Unit Building and its associated ancillary structures and features, which have remained largely vacant since 2008.⁵ The adaptive reuse

¹ Draft SEIR. p. 2-10.

² *Ibid.*

³ *Ibid.* p. 2-13.

⁴ *Ibid.* p. 2-10.

⁵ *Ibid.* p. 2.20.

program would provide approximately 615 residential units, up to 90,000 sf of commercial, office, and community facility uses, and up to 200 patient and caregiver lodging rooms.⁶ Project buildout is anticipated to occur over an approximately 25-year planning horizon.⁷

South Coast AQMD Comments

Unavailability of Incorporated Documents Referenced in the Draft SEIR

Section 1.4 (Incorporation by Reference) of the Draft SEIR identifies documents incorporated by reference pursuant to State CEQA Guidelines Section 15150.⁸ However, the hyperlink provided in the Draft SEIR does not appear to be functioning, and the referenced documents are therefore not readily accessible for public review.

As a result, South Coast AQMD staff is unable to verify the project descriptions, environmental analyses, and conclusions contained in the certified 2014 Master Plan EIR and compare them with those presented in the Draft SEIR. Therefore, the Lead Agency is recommended to ensure that all documents incorporated by reference are publicly available and accessible throughout the review period. This will allow reviewing agencies and interested parties to evaluate the relationship between the approved 2014 Master Plan EIR and the current Draft SEIR, including identifying which analyses have been incorporated, updated, or carried forward.

Given the current unavailability of the incorporated reference documents, South Coast AQMD staff cannot determine whether the analyses and conclusions from the certified 2014 Master Plan EIR have been appropriately incorporated into, updated by, or relied upon in the Draft SEIR. Making these documents available is necessary to facilitate a complete and informed review of the environmental analysis presented in the Draft SEIR.

Potential of Underestimated Construction Analysis

Section 3.2 (Air Quality) of the Draft SEIR states that construction-related emissions of volatile organic compounds (VOCs) and nitrogen oxides (NOx) exceed applicable significance thresholds prior to mitigation.⁹ The Draft SEIR concludes that implementation of Mitigation Measures AIR-1a and AIR-1b would reduce these impacts to a less-than-significant level.¹⁰

However, it is unclear whether the construction emissions analysis accounts for both the newly proposed development evaluated in the Draft SEIR and the previously approved project components analyzed in the certified 2014 Master Plan EIR. If the analysis quantifies emissions solely from the proposed modifications and does not consider the potential for concurrent construction activities associated with previously approved development, the analysis may underestimate total construction emissions and associated air quality impacts.

Therefore, the Lead Agency is recommended to clarify the scope of the construction emissions analysis and identify the emissions attributable to previously approved project components

⁶ *Ibid.* p. 2-21.

⁷ *Ibid.* p. 2-12.

⁸ *Ibid.* p. 1-16.

⁹ *Ibid.* p. 3.2-42.

¹⁰ *Ibid.* p. 3.2-44.

separately from those associated with the proposed development analyzed in the Draft SEIR. The Lead Agency is also recommended to evaluate whether overlapping or concurrent construction activities could result in higher peak emissions than those presented in the Draft SEIR and whether such emissions would continue to be reduced to less than significant levels following mitigation. Any revisions to the construction emissions analysis, including supporting assumptions, calculations, and evidence demonstrating the effectiveness of the proposed mitigation measures, should be provided in the Final SEIR.

Unclear Information Regarding Permitted Stationary Sources

Section 3.2 (Air Quality) of the Draft SEIR states that installation of additional boilers, chillers, emergency generators, and other stationary sources would require permits from South Coast AQMD and concludes that the potential operational impacts are less than significant.¹¹ However, the Draft SEIR does not provide sufficient detail on the specific stationary emission sources required to support the Proposed Project, such as the equipment type, fuel type, rated capacity, operational characteristics, expected hours of operation, nor does it quantify operational emissions from such equipment. In the absence of this information, the basis for the less-than-significant impact conclusion cannot be independently evaluated. Therefore, the Lead Agency is recommended to identify and describe all stationary emission sources anticipated to be installed and operated as part of the Proposed Project, including any components of previously approved development evaluated in the 2014 Master Plan EIR that are being carried forward in the Draft SEIR. At a minimum, the Final SEIR should disclose the equipment type, fuel type, rated capacity, operational characteristics, expected hours of operation, and applicable South Coast AQMD permit requirements for each stationary source. The Lead Agency is also recommended to revise the air quality analysis to quantify emissions from these sources and provide the supporting assumptions, calculations, emission factors, and technical documentation necessary to substantiate the conclusions presented. Additional detail regarding these regulatory requirements is provided in the South Coast AQMD Air Permits and Role as a Responsible Agency comment of this letter.

South Coast AQMD Air Permits and Role as a Responsible Agency

As stated in the aforementioned comment of this letter, the information regarding the use of stationary sources is unclear. Therefore, 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, etc., air permits from South Coast AQMD will be required. The Final SEIR 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,¹² Rule 203 – Permit to Operate,¹³ Rule 401 – Visible Emissions,¹⁴ Rule 402 – Nuisance,¹⁵ Rule 403 – Fugitive Dust,¹⁶ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁷ Rule 1113

¹¹ *Ibid.* p. 3.2-54.

¹² South Coast AQMD, Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹³ South Coast AQMD, Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹⁴ South Coast AQMD, Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

¹⁵ South Coast AQMD, Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹⁶ South Coast AQMD, Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹⁷ South Coast AQMD, Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

– Architectural Coatings,¹⁸ and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹⁹ 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 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>.

Potential of Underestimated Modeling Results for Operational Impacts Due to the Lack of Stationary Sources

Section 3.2 (Air Quality) of the Draft SEIR states that a central utility plant could be developed and that associated power generation and plant equipment would be subject to the South Coast AQMD New Source Review permitting requirements, including Rule 1401.²⁰ Based on this assumption, the Draft SEIR concludes that impacts associated with stationary sources would be less than significant.²¹ However, given the uncertainty regarding the type, size, and operational

¹⁸ South Coast AQMD, Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹⁹ South Coast AQMD, Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

²⁰ *Ibid.* p. 3.2-57.

²¹ *Ibid.*

characteristics of the stationary sources that may ultimately be required, the conclusion of less than significant impact is not adequately supported by substantial evidence. Therefore, the Lead Agency is recommended to identify the stationary sources expected to be required for operation and perform the health risk assessment accordingly, and include it in the Final SEIR with the evaluation of potential health risks associated with these sources and provide supporting analyses, assumptions, calculations, and technical evidence necessary to demonstrate that the impact conclusions are supported by substantial evidence in the record.

Information on the CERP for the Designated AB 617 East Los Angeles, Boyle Heights, West Commerce (ELABHWC) Community

The Proposed Project area is heavily impacted by air pollution generated from sources such as heavy-duty diesel trucks, warehouses, and railroad activities, and includes the AB 617-designated ELABHWC community. An AB 617-designated community requires South Coast AQMD to work with a Community Steering Committee (CSC) to develop a Community Emissions Reduction Plan (CERP) that identifies air quality priorities and actions to reduce air pollution in the community. The South Coast AQMD's Governing Board adopted the AB 617 ELABHWC Community CERP on September 6, 2019.²² The Draft SEIR for the Proposed Project serves as the first-tier, programmatic-level environmental analysis that can provide guidance to subsequent, project-level environmental analyses. South Coast AQMD staff recommends that the Lead Agency review the actions included in Chapter 5 of the adopted CERP and continue working with South Coast AQMD's AB 617 staff to explore whether additional mitigation measures can be identified and implemented by future development projects at the Proposed Project site.

Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, the following mitigation measures and project design considerations are recommended to be incorporated into the Final SEIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

1. Require ZE or 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 CARB'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 for use.

²² South Coast AQMD. September 2019. Assembly Bill 617 East Los Angeles, Boyle Heights, West Commerce Community Emissions Reduction Plan. Accessed at: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/east-la/cerp/carb-submittal/final-cerp.pdf>

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 are 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.

Mitigation Measures to Reduce Operational Air Quality Impacts from 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 incorporate 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 Act²³
2. South Coast AQMD 2022 Air Quality Management Plan,²⁴ 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) Transportation, Air Quality, and Climate Change.²⁵

Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

On May 7, 2021, South Coast AQMD’s Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program,²⁶ and Rule 316 – Fees for Rule 2305.²⁷ Rules 2305 and 316 are new rules that will reduce regional and local emissions of NOx and particulate matter (PM), including DPM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 sf. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn Points on behalf of their tenants if they choose, because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance, the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of 160,000 sf of warehouse, the Proposed Project’s warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. South Coast AQMD staff is available to answer questions

²³ 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>

²⁴ 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>

²⁵ United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change available at <https://www.epa.gov/transportation-air-pollution-and-climate-change>

²⁶ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program available at <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

²⁷ South Coast AQMD Rule 316 – Fees for Rule 2305 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/r316.pdf>

concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.²⁸

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final SEIR. 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 SEIR. 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 are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

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²⁸ South Coast AQMD WAIRE Program available at <http://www.aqmd.gov/waire>.