



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Notice of Preparation of a Draft Program Environmental Impact Report (Draft PEIR)
for the Los Angeles County San Fernando Valley Area Plan (Proposed Project)
(SCH# 2026040380)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. The following comments provide observations and may include recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft PEIR. Please transmit a copy of the Draft PEIR upon its completion and public release directly to South Coast AQMD. **In the transmittal, please also provide electronic versions of all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses in their original format (e.g., not in .pdf), including but not limited to emission calculation spreadsheets, air quality modeling files, and health risk assessment input and output files.**

CEQA Air Quality Analysis

According to the Notice of Preparation of a Draft PEIR, the Proposed Project is a community-based plan that focuses on land use and policy issues specific to the unique characteristics and needs of the Project area. The San Fernando Valley Area Plan (SFVAP) is a long-range policy document that will guide long-term regulation of land uses in the unincorporated communities in the Project area through development of goals, policies, and implementation actions. The proposed Project would amend the General Plan to establish both areawide and community-specific goals and policies addressing land use concerns and issues. The SFVAP includes goals and policies addressing preservation of community character; open space and natural resource protection; historic preservation; protection of community health, safety, and general welfare; increased access to community amenities and other topics.¹ Since the upcoming Draft PEIR will need to analyze the potential environmental impacts of San Fernando Valley Area Plan, the Lead Agency is recommended to include an evaluation in the Draft PEIR of a reasonably foreseeable scenario which reflects the maximum development intensity that would be allowed under the proposed land use designations and associated infrastructure expansion at full buildout and disclose the air quality, greenhouse gas, and health risk implications of this growth to the fullest extent feasible.

¹ Notice of Preparation of the Draft PEIR.

The Lead Agency should identify all reasonably foreseeable air pollutant sources related to the Proposed Project and analyze and quantify potential air quality and greenhouse gas impacts during all phases (including overlapping construction and operational phases) associated with future development under General Plan Amendment No. RPPL2025000604, Zone Change No. RPPL2026000988, and the proposed ordinance amending Title 22 (Planning and Zoning) within the SFVAP. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). For the Proposed Project, construction-related emissions should also include infrastructure-related activities such as roadway improvements, wastewater and water system improvements, flood control and drainage improvements, utility expansion, and other infrastructure needed to support future growth. Operation-related air quality and greenhouse gas impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality and greenhouse gas impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, if the Lead Agency elects to rely on South Coast AQMD's Air Quality Significance Thresholds,² the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's air quality significance thresholds for *operation* to determine the level of significance.

The Lead Agency is recommended to rely on the guidance provided in the South Coast AQMD's CEQA Air Quality Handbook and website³ when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)⁴ software, to quantify emissions of air pollutants from typical land use development project.

If the Proposed Project would generate diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially if heavy-duty diesel-fueled vehicles will be used, it is recommended that the Lead Agency perform a mobile source health risk assessment.⁵

South Coast AQMD has developed a methodology⁶ to assist lead agencies with analyzing localized air quality impacts from site-specific projects located near sensitive receptors. However, because scale of the Proposed Project is large and programmatic in nature, the screening tables which contain localized significance thresholds (LSTs) cannot be relied upon to determine localized impacts. Instead, the Lead Agency is recommended to evaluate the potential localized

² South Coast AQMD Air Quality Significance Thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>.

³ South Coast AQMD's CEQA Air Quality Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

⁴ CalEEMod is available free of charge at: www.caleemod.com.

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

air quality impacts from the Proposed Project by conducting air dispersion modeling to determine whether the applicable ambient air quality standards would be exceeded.

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. If the Proposed Project results in substantial residential growth and introduces a mix of residential, commercial, mixed-use, light industrial, and heavy industrial land uses within an area bisected by heavily trafficked freeways, interstates, or rail corridors, the Lead Agency should evaluate reasonably foreseeable health risks to existing and future sensitive receptors from both mobile and stationary sources. This evaluation should consider exposure to toxic air contaminants from both mobile sources (e.g., vehicle traffic) and stationary sources (e.g., industrial operations), and the findings should be disclosed in the Draft PEIR.⁷ To the extent feasible, the Draft PEIR should identify areas where future sensitive land uses may be exposed to elevated levels of diesel particulate matter (DPM) and other air pollutants, and should include planning-level policies, siting considerations, and mitigation measures to reduce exposures.

To assist with identifying ways to minimize air quality impacts from the Proposed Project, the Lead Agency is also recommended to consult and apply the guidance from the California Air Resources Board (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*,⁸ which is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. CARB has another helpful technical advisory, *Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways*, which contains additional guidance on strategies to reduce air pollution exposure of Proposed Projects located near high-volume roadways.⁹

Since the Proposed Project will involve local planning and land use decisions, the Lead Agency is recommended to review and consider applying the recommendations contained in the South Coast AQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*,¹⁰ which includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health.

If the Proposed Project's planning area includes future light and heavy industrial land use designations, these uses could result in substantial emissions of criteria pollutants and toxic air contaminants, raising potential land use compatibility concerns with nearby sensitive receptors. Accordingly, it is recommended that the Lead Agency evaluate the potential air quality and

⁷ <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>

⁸ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>.

⁹ CARB's *Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways*, April 2017, available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf.

¹⁰ South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

associated health risks of these designations in the Draft PEIR. This evaluation should incorporate assumptions representing the full range of reasonably foreseeable industrial activities that could occur under implementation of the Proposed Project.

If the Proposed Project includes land use designations such as light industrial or heavy industrial uses, it may enable future development of warehouses and other truck-intensive operations. These types of uses can generate and attract heavy-duty diesel-fueled trucks, which emit diesel particulate matter (DPM), a recognized toxic air contaminant. The South Coast AQMD Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution sources is DPM emissions.¹¹ Because the Proposed Project would influence future development patterns, the Draft Program Environmental Impact Report (PEIR) should assess the likelihood of future warehouse and other truck-intensive uses and analyze their potential contribution to cumulative DPM exposure in the surrounding area. To the extent feasible, the Draft PEIR should also disclose existing cancer risk levels within the project area using available resources, such as the MATES V¹² carcinogenic risk interactive map, and evaluate how development enabled by the Proposed Project could further contribute to cumulative health risks.

To minimize the impacts of DPM from the Proposed Project and avoid exacerbating existing conditions, the Lead Agency is encouraged to evaluate either quantitatively or qualitatively the potential health risk impacts to nearby sensitive receptors and if significant impacts are identified, to include mitigation measures in the Draft PEIR (which are discussed later in this letter) that would reduce or eliminate the DPM health risks to the surrounding community.

In addition, some warehouses could potentially be receiving and storing materials sterilized with ethylene oxide (EtO), a known carcinogen identified by CARB as a Toxic Air Contaminant and by the U.S. EPA as a Hazardous Air Pollutant. EtO is a flammable, colorless gas used in many industries to make products including antifreeze, textiles, solvents, detergents, and adhesives. EtO is also used to sterilize medical devices, the primary use within South Coast AQMD. Due to concerns of EtO off-gassing from sterilized materials and the associated warehouses that receive and store materials sterilized with EtO, there is a potential that some warehouses could emit EtO and pose a cancer risk to workers and nearby sensitive receptors.

If the Proposed Project may facilitate future warehouse development, the Lead Agency is recommended to include a scenario in the Draft PEIR which analyzes the potential risk from EtO emissions associated with warehouse storage activities. The Lead Agency is also recommended to notify the project proponent, including the potential future tenants, if known, that if sterilization activities or related operations involving the storage or transport of materials sterilized with EtO are intended to occur at the Proposed Project site, such activities would be subject to the requirements of South Coast AQMD Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations.¹³ Rule 1405 contains a variety of requirements applicable to both facilities and certain large warehouses that receive EtO-sterilized products. For the latter,

¹¹ South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

¹² South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/air-quality/air-quality-studies/health-studies/mates-v).

¹³ South Coast AQMD, Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations. Available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1405.pdf>.

warehouse operators are required to provide records and emissions data through fence-line monitoring or emissions studies to help assess EtO emissions from warehouses. Rule 1405 is intended to minimize EtO emissions from these sources to protect public health, particularly in nearby communities that may be vulnerable to toxic air contaminants.

Lastly, for future development Projects that include warehouse uses involving EtO-sterilized materials, the Lead Agency is recommended to require a project-specific health risk assessment to evaluate the potential health risks from EtO emissions and include this information in the CEQA analysis to facilitate full disclosure of potential health risk impacts.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,¹⁴ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,¹⁵ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.¹⁶

The Lead Agency is recommended to consider including mitigation measures and planning strategies for reducing operational and exposure-related air quality impacts from future development facilitated by the Proposed Project in the Draft PEIR, as follows:

- Avoid locating new sensitive land uses within close proximity to substantial sources of air pollution, including freeways, rail lines, heavy industrial uses, truck-intensive land uses, and other major emission sources, unless appropriate avoidance, minimization, and mitigation measures are incorporated.
- Incorporate planning-level policies and development standards that promote land use compatibility and reductions in air pollution exposure, such as setbacks, buffer areas, site design considerations, and separation between sensitive receptors and substantial air pollution sources.
- Encourage zero-emissions (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), when feasible. The Lead Agency should require a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. At a minimum,

¹⁴ South Coast AQMD's CEQA Air Quality Handbook, Available at: <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

¹⁵ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

¹⁶ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

require the use of 2010 model year¹⁷ that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. The Lead Agency should require regular inspections to be conducted to the maximum extent feasible to ensure compliance. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. 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.
- 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.

The Lead Agency is recommended to consider including mitigation measures specific to reducing or eliminating operational air quality impacts from other area sources, as follows:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

To further reduce air quality and health risk impacts, the Lead Agency is recommended to incorporate the following design considerations in the Draft PEIR:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- 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.

¹⁷ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

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, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NO_x) and particulate matter (PM), including DPM. These emission reductions will reduce public health impacts from mobile sources that are associated with warehouse activities on communities located near warehouses. 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 square feet. 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 in to earn WAIRE Points on behalf of their tenants if they choose because certain actions to reduce emissions may be better achieved at the warehouse development phase (e.g., the installation of solar and charging infrastructure). Rule 316, the companion fee rule to Rule 2305, which allows the South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project is a program-level planning document that may facilitate future warehouse and other truck-intensive land uses that could be subject to Rule 2305, the Lead Agency is recommended to evaluate whether the Draft PEIR can incorporate planning-level policies, development standards, infrastructure considerations, and/or mitigation measures that may support future compliance with Rule 2305 and reduce emissions from warehouse-related operations. In addition, the Lead Agency is recommended to 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 to help future warehouse operators meet their compliance obligation.¹⁸ South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For more information on implementation guidance and the available compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.¹⁹

Also, 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, spray booths, etc., one or more air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency under CEQA to a Responsible

¹⁸ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

¹⁹ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

Agency as defined in CEQA Guidelines Section 15381. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the air permit(s) under CEQA and imposing permit conditions and limits. Questions about air permit requirements should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

In addition, 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 evaluating the applications for air permits. For these reasons, the EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project, if applicable. Also, as set forth in CEQA Guidelines Sections 15086, the Lead Agency is required to consult with all Responsible Agencies with discretionary approval power over the Proposed Project. Thus, if air permits are required and South Coast AQMD is identified as a Responsible Agency, please let this comment letter serve as South Coast AQMD's request to convene a meeting with the Lead Agency as required by CEQA Guidelines Section 15104 to discuss the scope and content of the environmental information that will need to be included in the Draft EIR.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters,²⁰ a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the Draft EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Draft EIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and

²⁰ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.

mitigated where feasible. If you have any questions regarding this letter, please contact Jivar Afshar, Air Quality Specialist at jafshar@aqmd.gov.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:JA

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