



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

November 9, 2017

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Draft Environmental Impact Report (EIR) for the Proposed 668 S. Alameda Street (ENV-2016-3576-EIR)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing 131,350-square-foot facility and construct a 577,301-square-foot, mixed-use building with 475 live/work units and 61,200 square feet of commercial uses (Proposed Project). The Proposed Project is surrounded by industrial, warehouse, and commercial facilities. Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project would be located less than 250 feet from a bus terminal to the south. Construction is expected to last approximately 36 months, beginning in 2018.

Health Risk Assessment from Sources of Air Pollution

Notwithstanding the court rulings, SCAQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of SCAQMD's concern about the potential public health impacts of siting the Proposed Project within a heavy manufacturing zone, SCAQMD staff recommends that, prior to approving the Proposed Project, the Lead Agency consider the impacts of air pollutants on people who will live and work at the Proposed project and provide mitigation where necessary.

Based on a review of the Draft EIR, SCAQMD staff found that the Proposed Project is located within a heavy manufacturing zone (M3-1-RIO)¹ where there are at least seven SCAQMD permitted facilities within one quarter mile², which serves as substantial evidence to support a disclosure of potential health impacts in the Final EIR³. Additionally, based on a review of aerial photographs, SCAQMD staff found that the Proposed Project is located within 500 feet from warehouse facilities and a bus terminal with loading docks for diesel heavy duty trucks and buses. Diesel particulate matter emitted from diesel powered engines (such as from trucks and buses) has been classified as a toxic air contaminant and a carcinogen. Since people living and working at the Proposed Project would likely be exposed to toxic emissions from these nearby sources of air pollution, SCAQMD staff recommends that the Lead Agency

¹ Draft EIR. Page 198.

² Based on a search of the SCAQMD's Facility Information Detail (FIND) database, SCAQMD staff found that the following SCAQMD permitted facilities were located in the vicinity of the Proposed Project: Facility IDs 23793, 101743, 141406, 170349, 140638, 13537, and 128936. The FIND database is available at: <http://www.aqmd.gov/home/tools/public/find>. This information is to assist the Lead Agency's evaluation of the Proposed Project's long-term health risks from sources of air pollution.

³ South Coast Air Quality Management District. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis". Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

conduct a Health Risk Assessment (HRA) for the Proposed Project's operations to disclose the potential health risks in the Final EIR⁴.

Guidance Regarding Residences Sited Near Sources of Air Pollution

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides recommended 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. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>.

Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁵. Guidance on strategies to reduce air pollution exposure near high-volume roadways is also available on CARB's website⁶. As stated in the CARB's Air Quality and Land Use Handbook, it is recommended that the Lead Agency use the planning process to ensure the appropriate separation of industrial facilities and sensitive land uses such as housing.

Pursuant to California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA Section, at (909) 396-3479, if you have any questions.

Sincerely,

Lijin Sun

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Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:RB

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Control Number

⁴ SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

⁵ California Air Resources Board. April 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>.

⁶ In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.