



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Centennial Project (“Proposed Project”) (SCH No. 2004031072)

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

On March 3, 2017, the SCAQMD’s Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP¹ is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment. Achieving NO_x emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable.

SCAQMD staff understands that one of the project objectives is to create a healthy and sustainable community by integrating alternative transportation choices, including transit use, renewable energy, water conservation, community wellness, and other green development features to the proposed project’s designs. The proposed project will provide a broad range of residential (including affordable housing), commercial, institutional, recreational, and employment-generating land use types², which will make nearly half of daily vehicular trips occur within the proposed project area³. Additionally, the Centennial Green Development Program encompasses a broad range of sustainable development practices for all development phases of the proposed project and deploys innovative and green technologies over time⁴. This project exemplifies the County of Los Angeles’s (County or Lead Agency) leadership in promoting sustainable communities development – a commitment that is reassured by the County in its Strategic Plan 2015-2020⁵. SCAQMD staff believes that the proposed project supports the goals of the 2016 AQMP and will help reduce emissions from mobile sources, protect public health from air pollution, and achieve healthful air in the Basin.

¹ South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

² Draft EIR. Section 3.0, *Environmental Setting*. Pages 3-19 and 20. Section 4.0, *Project Description*. Pages 4-4 and 5.

³ *Ibid.* Section 5.11, *Air Resources*. Page 5.11-19. “The Project would generate an estimated 146,154 daily trips at Buildout, with approximately 48 percent (70,246 trips) being internal trips.”

⁴ *Ibid.* Section 1.0, *Executive Summary*. Page 1-5. Section 4.0. Pages 4-70 through 72.

⁵ Los Angeles County Department of Regional Planning. June 2015. *Strategic Plan 2015-2020*. Accessed at: http://planning.lacounty.gov/assets/upl/general/strategic-plan_2015-2020.pdf.

Project Description and Project Location

The Lead Agency proposes to develop land use strategies to allow the future development of 19,333 residential units, 7,363,818 square feet of office and warehousing uses, 1,034,550 square feet of commercial uses, 1,568,160 square feet of education and medical uses, and 5,624 acres of open space on 12,323 acres⁶. The proposed project is located near the northeast corner of State Route 138 (SR-138) and Interstate Highway 5 (I-5) in the vicinity of Quail Lake south of the Kern County and Los Angeles County boundary line. The Lead Agency will also prepare a Centennial Specific Plan to create a planning framework, development standards and design guidelines⁷. The proposed project will be developed in phases over a 20-year period⁸. Construction “was assumed to begin in 2016, with buildout complete in 2035, although the actual start of construction and buildout are likely to occur later than 2016 and 2035, respectively”⁹. “As construction progresses, it is likely that various construction stages would occur at the same time”¹⁰.

The proposed project is under the jurisdiction of two different air districts. “Approximately 91 percent of the site is within the boundaries of the Antelope Valley Air Quality Management District (AVAQMD), while approximately 9 percent of the southwest portion of the Project site is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD).”¹¹ Additionally, “there are two Not a Part (NAP) areas shown within the southwestern portion of the Project area, encompassing 25.2 and 1.9 acres”¹². Based on a review of Exhibit 4-1, *Conceptual Land Use Plan* and Exhibit 4-3, *Villages and Core Areas* of the Draft EIR, SCAQMD staff found that the portion within the SCAQMD’s jurisdiction will include commercial uses and open space, and is within the Centennial Specific Plan Village 9 planning areas¹³.

Air Quality and Health Risk Assessment Analyses

The Lead Agency quantified the propose project’s construction and operational emissions and compared them to SCAQMD’s and AVAQMD’s air quality CEQA significance thresholds to determine the significance of air quality impacts. The Lead Agency found that the construction emissions would exceed SCAQMD’s regional air quality CEQA significance thresholds for VOCs and NOx after incorporating Mitigation Measure (MM) 11-2 and MM 11-3¹⁴, and that the localized construction impacts could be significant and unavoidable since construction activities in one or several planning areas may affect already-established sensitive uses within the proposed project area¹⁵. The Lead Agency also found that at buildout, in 2035, the proposed project’s long-term operational emissions of VOCs, NOx, CO, PM10, and PM2.5 would exceed SCAQMD’s air quality CEQA significance thresholds¹⁶. After mitigation, these impacts would remain significant and unavoidable¹⁷. For the proposed project’s long-term health risks, the Lead Agency found that the highest estimated cancer risk for a 30-year exposure would be 0.2 in a million¹⁸.

⁶ *Ibid.* Section 1.0. Page 1-4. Section 4.0. Page 4-6.

⁷ *Ibid.* Section 3.0. Page 3-1 and 2.

⁸ *Ibid.* Section 4.0. Page 4-6.

⁹ *Ibid.* Page 4-90.

¹⁰ *Ibid.* Section 5.11. Page 5.11-18.

¹¹ *Ibid.* Section 1.0. Page 1-3.

¹² *Ibid.* Section 3.0. Page 3-9. Section 4.0. Page 4-3. Section 5.11. Exhibit 5.11-1, *Air District and Basin Boundaries*.

¹³ *Ibid.* Section 4.0.

¹⁴ *Ibid.* Section 1.0. Pages 1-18 and 19.

¹⁵ *Ibid.* Section 5.11. Page 5.11-60.

¹⁶ *Ibid.* Section 1.0. Pages 1-18 and 19.

¹⁷ *Ibid.*

¹⁸ *Ibid.* Section 5.11. Page 5.11-74.

General Comments

SCAQMD staff has comments on the proposed project's Mitigation Measures for Air Resources. These comments are intended to further reduce construction and operational emissions. Additionally, SCAQMD staff recommends that the Lead Agency revise the health risk assessment (HRA) to disclose the potential health risks to the people who will live and work at the proposed project. Additional details are included in the attachment.

Conclusion

In closing, SCAQMD staff encourages the County to continue creating livable, sustainable, and healthy communities that can benefit air quality and ensure that the Basin is on track to attain the NAAQS. Pursuant to the Public Resources Code Section 21092.5 and the CEQA Guidelines Section 15088, the Lead Agency is required to provide SCAQMD with written proposed 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 other air quality and health risk questions that may arise. Please contact me at (909) 396-3308 or lsun@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

JW:LS

LAC170705-01

Control Number

ATTACHMENT

SCAQMD's Air Quality CEQA Thresholds of Significance

1. Based on the proposed project's construction schedule¹⁹, construction and operation activities are expected to overlap during a 20-year development period. The Lead Agency combined the construction and operational emissions and disclosed the calculations in the Draft EIR for information. In the case of overlapping construction and operation activities, SCAQMD staff recommends adding the construction and operational emissions and comparing those emissions to SCAQMD's air quality CEQA significance thresholds for operation²⁰ to determine the level of significance.

Health Risk Assessment from Mobile Sources

2. 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 sensitive populations within close proximity of freeways, SCAQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

The goal of an EIR is to inform government agencies and the public of the environmental impacts of a proposed project (CEQA Guidelines Section 15003(c)). Based on a review of the Project Description, SCAQMD staff found that the proposed project is located in proximity to I-5 and SR-138. Although the small portion of the proposed project that is within the SCAQMD's jurisdiction includes only open space and commercial uses (no residential homes), to facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the Lead Agency consider the impacts of air pollutants on people who will live at the proposed project by revising the HRA to place additional receptors at future residential development to disclose the potential health risks to the people who will live and work at the proposed project in the Final EIR.

Guidance Regarding Residences Sited Near a High-Volume Freeway

3. Numerous health studies have demonstrated potential adverse health effects associated with living near highly travelled roadways. In traffic-related studies, the additional non-cancer health risk attributable to proximity is seen within 1,000 feet and is strongest within 300 feet²¹. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet²². As a result of these studies, the California Air Resources Board (CARB) developed the Air Quality and Land Use Handbook²³ that recommends avoiding new sensitive land uses (such as housing) within 500 feet of a freeway. Additional research has shown that the near roadway environment also contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging²⁴.

¹⁹ *Ibid.* Section 4.0. Pages 4.0-6 and 90. Section 5.11. Page 5.11-18.

²⁰ South Coast Air Quality Management District. *SCAQMD Air Quality Significance Thresholds*. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.

²¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective". Page 6. Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>.

²² *Ibid.*

²³ *Ibid.*

²⁴ See Chapter 9 of the 2012 AQMP for further information. Accessed at: [http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/chapter-9-final-2012.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf).

Guidance²⁵ on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Enforceability of Existing Mitigation Measures for Air Resources: MM 11-1 through MM 11-11

4. CEQA requires that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (California Public Resources Code Section 21081.6 (b) and CEQA Guidelines Section 15126.4 (a)(2)). Based on a review of the Air Resources section, SCAQMD staff found that the Lead Agency is committed to eleven mitigation measures. SCAQMD staff recommends that the Lead Agency provide more details in the Final EIR such as the Mitigation Monitoring and Reporting Program (MMRP) for the proposed project to ensure that these mitigation measures are fully enforceable. In the event that any mitigation measure is later found or proved to be infeasible after the Final EIR is certified, this constitutes substantial changes that require a new environmental assessment by the Lead Agency to determine if there will be a substantial increase in the severity of the air quality impacts triggering the preparation of a supplement to the EIR (CEQA Guidelines Sections 15162 and 15163).

Recommended Changes to Existing Mitigation Measure: MM 11-10

5. In MM 11-10, the Lead Agency requires that “[...] any land uses involving the public congregation of sensitive receptors (e.g. residential, schools, hospital, daycare center) are not within 150 feet of the near edge of the SR-138 traffic lanes”²⁶. As described above in Comment No. 3, CARB recommends avoiding new sensitive land uses (such as housing) within 500 feet of a freeway. Therefore, SCAQMD staff recommends that the Lead Agency revise MM 11-10 as follows:

MM 11-10 The Project’s plans and specifications shall demonstrate that any land uses involving the public congregation of sensitive receptors (e.g. residential, schools, hospital, daycare center) are not within ~~150~~ 500 feet of the near edge of the SR-138 traffic lanes.

Consideration of Limits to Enhanced Filtration Units: MM -11

6. Many strategies are available to reduce exposure, including, but are not limited to, building filtration systems, sound walls, vegetation barriers, etc.²⁷ Because of the potential adverse health risks involved with siting housing near a freeway, it is essential that any proposed strategy must be carefully evaluated before implementation. When enhanced filtration units on housing residents are proposed, the Lead Agency should consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters,²⁸ costs were expected to range from \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and it does not account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of any filtration units should therefore be

²⁵ 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. Accessed at: <https://www.arb.ca.gov/ch/landuse.htm>.

²⁶ Draft EIR. Section 5.11. Page 5.11-82.

²⁷ CARB. April 2017. *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*.

²⁸ This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see also 2012 Peer Review Journal article by SCAQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

evaluated in more detail prior to assuming that they will sufficiently alleviate near roadway exposures.

Additional Recommended Mitigation Measures to Further Reduce Operational Emissions

7. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. In addition to the MM-4, MM-5, and MM-6 that proposed in the Draft EIR starting on page 5.11-79, SCAQMD staff recommends that the Lead Agency include additional mitigation measures for residential buildings in the Final EIR to further reduce the significant operational impacts.
 - a) Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing residence or a common electrical charging area. Therefore, SCAQMD staff recommends the Lead Agency require the residential buildings of the proposed project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. For residences, SCAQMD staff recommends that homes be appropriately wired from the electrical panel to later allow residents to install electrical chargers, if desired. At a minimum, residential electrical panels should appropriately-sized to allow for future expanded use.
 - b) Residential parking shall include community electric vehicle charging station(s). Recommend 5% of parking spaces

Permits

8. The Lead Agency stated that the proposed project will include stationary sources, including, but not limited to, “boilers, emergency generators, spray booths, restaurant broilers, gasoline service stations, solvent storage tanks, small source PM-generators, and dry cleaners”²⁹. In the event that a permit from SCAQMD is required, SCAQMD should be identified as a responsible agency for the proposed project in the Final EIR. Should there be any questions on permits, please contact the SCAQMD’s Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit the SCAQMD webpage, at: <http://www.aqmd.gov/home/permits>.

Other Comment

9. Based on a review of the information on Pages 5.11-54 through 56, SCAQMD staff found that there were inconsistencies in terms the year representing the reasonable worst-case scenario for combined construction and operational emissions during development. The Lead Agency stated that “as a reasonable worst-case scenario, it is assumed that the Project would be 90 percent operational in Year 18 and consequently 90 percent of operational phase emissions were combined with construction emissions occurring in Year 18.³⁰” However, as shown in Table 1 below, Year 11 was included as the worst-case scenario for SCAQMD. Therefore, it is recommended that the Lead Agency correct the inconsistency or provide additional clarifications in the Final EIR.

²⁹ Draft EIR. Section 5.11. Page 5.11-20.

³⁰ *Ibid.* Section 5.11. Page 5.11-54.

Table 1
Copy of Table 5.11-21, Estimated Annual Mid-Project Combined Emissions
(SCAQMD Units [lbs/day])

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Unmitigated Emissions						
Year 18 Construction	94	137	207	1	73	33
Year 18 Operations	1,319	761	3,948	13	1,430	410
Combined Year 11 Emissions	2,413	898	4,155	2	1,503	443
SCAQMD Operations Thresholds	55	55	550	150	150	55
Exceeds Threshold	Yes	Yes	Yes	No	Yes	Yes
Mitigated Emissions						
Year 11 Construction	75	43	272	1	37	14
Year 11 Operations	1,319	761	3,948	13	1,430	410
Combined Year 11 Emissions - construction	1,394	804	4,220	2	1,467	424
SCAQMD Operations Thresholds	55	55	550	150	150	55
Exceeds Threshold	Yes	Yes	Yes	No	Yes	Yes
lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less. Note: Totals may not add due to rounding. Bold indicates emissions exceeding threshold Sources: SCAQMD 2015 (thresholds). Emissions calculations can be found in Appendix 5.11-A						