



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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michael.sin@lacity.org

darlene.navarrete@lacity.org

Michael Sin, City Planning Associate

Los Angeles City Hall –Department of City Planning

200 N. Springs Street, Room 750

Los Angeles, CA 90012

Mitigated Negative Declaration (MND) for the Proposed 1800 E 7th St; Central City North (ENV-2016-2684)

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 MND.

Project Description

The Lead Agency proposes to demolish the existing surface parking lot and construct a mixed-use building with subterranean parking. The mixed-use building will contain 122 live/work units; 9,500 square feet of commercial space, and 5,885 square feet of art space (Proposed Project). The Proposed Project is surrounded by a bus terminal to the west and industrial uses and warehouse facilities to the north, east, and south.

Air Quality Analysis

In the Air Quality section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. The Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant with mitigation.

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 sensitive populations 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 at the Proposed project and provide mitigation where necessary.

Based on a review of the MND, SCAQMD staff found that the Proposed Project is located within a heavy manufacturing zone (M3-1-RIO)¹ where there are six SCAQMD permitted facilities within one quarter miles². 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 busses. Diesel particulate matter emitted from diesel powered engines (such as from trucks and busses) has been classified by the state as a toxic air contaminant and a carcinogen. Since people at the Proposed Project would be exposed to toxic emissions from these nearby sources of

¹ MND Page 13.

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, 138323, 138522, 119924, 142542, and 120293. 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.

air pollution, SCAQMD staff recommends that the Lead Agency conduct a health risk assessment (HRA)³ to disclose the potential health risks in the Final MND⁴.

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 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. 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*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance⁵ 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. 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 housing⁶.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. 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 Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

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Control Number

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>.

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 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>.

⁶ 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>.