



# 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:

October 9, 2018

[heather.bleemers@lacity.org](mailto:heather.bleemers@lacity.org)

Heather Bleemers

City of Los Angeles, Department of City Planning

221 North Figueroa St., Suite 1350

Los Angeles, CA 90012

## **Draft Environmental Impact Report (DEIR) for the Proposed 1375 St. Andrew's Apartments Project (ENV-2015-4630-EIR) (SCH No: 2016051068)**

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 the demolition of the two vacant buildings totaling 35,057 square feet, and construction of a 226,160-square-foot residential building with 185 residential units and 294 on-site parking spaces on 1.7 acres (proposed project).<sup>1</sup> The proposed project is located at 1375 St. Andrews Place on the southwest corner of St. Andrews Place and West De Longpre Avenue in the community of Hollywood. The project site is located immediately next to US Highway 101 (US-101) within 500 feet. Construction of the proposed project is expected to occur over a 24 month period with anticipated occupancy in 2021.<sup>2</sup>

### SCAQMD Staff's Summary of Air Quality Analysis

In the air quality section of the DEIR, the lead agency quantified the proposed project's construction and operational emissions and compared the impacts to SCAQMD's regional and localized air quality CEQA significance thresholds. As a result, the lead agency determined that the proposed project would result in less than significant regional air quality impacts during construction and operation, and less than significant localized air quality impacts during construction. However, the lead agency did not include an operational emissions LST analysis in the DEIR. SCAQMD staff recommends the lead agency revise the air quality analysis to disclose the localized operational emissions in the final EIR.

### Health Risk Assessment (HRA) Summary for Sensitive Receptors Near US-101 Freeway

The lead agency conducted a HRA and identified "carcinogenic risks estimates for the 30 year exposure scenario exceed the level posing no significant risk for residential receptors located on floor level 1."<sup>3</sup> Additionally, "For criteria pollutants, the assessment revealed maximum predicted PM10 concentrations for residential occupancies exceed the significance thresholds for the 24-hour and annual averaging times for floor levels 1 through 5. The PM2.5 significance threshold was exceeded on floor levels 1 and 2."<sup>4</sup> Furthermore, the lead agency included a discussion regarding Los Angeles Municipal Code (99.04.504.6) requiring maximum efficiency rating value (MERV) of 13 or better in residential units within 1,000 feet of a freeway.<sup>5</sup> SCAQMD staff recommends the additional considerations for siting sensitive receptors at the proposed project detailed below.

---

<sup>1</sup> DEIR. Section I. *Introduction & Summary*, Page I-4.

<sup>2</sup> DEIR. Section II. *Project Description*, Page II-36.

<sup>3</sup> DEIR. Appendix I.2 *Freeway Health Risk Assessment*, 7.0 Conclusion, Page 13.

<sup>4</sup> *Ibid.*

<sup>5</sup> DEIR. Section IV.B, *Air Quality*, Page IV.B-18

#### Additional Considerations for Sensitive Receptors

- a) If enhanced filtration system is installed, it is important to consider the limitations. In a study that SCAQMD conducted to investigate filters,<sup>6</sup> a cost burden is expected to be within the range of \$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 residents. 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. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residents prior to assuming that they will sufficiently alleviate exposures to DPM emissions.
- b) SCAQMD staff recommends that the lead agency make the following disclosures to prospective residents and include them as requirements in the final EIR.
- Disclosure on potential health impacts to prospective residents from living in proximity to freeways and the reduced effectiveness of air filtration system when windows are open;
  - Recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units;
  - Ongoing cost sharing strategies, if any, for replacing the enhanced filtration units;
  - Identification of the responsible implementing and enforcement agency such as the lead agency for ensuring that enhanced filters are installed at residential units before a permit of occupancy is issued;
  - Identification of the responsible entity such as Homeowners Association or property management for ensuring filters are replaced on time, if appropriate and feasible;
  - Criteria for assessing progress in installing and replacing the enhanced filtration units; and
  - Process for evaluating the effectiveness of the enhanced filtration units at the proposed project.

#### Additional Guidance for Siting Sensitive Receptors

- a) 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 SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* in 2005.<sup>7</sup> 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. Therefore, it is recommended that the lead agency review this guidance document in addition to the California Air Resources Board's Guidance document, *Air Quality and Land Use Handbook: A Community Health Perspective*, prior to approving the proposed project.

---

<sup>6</sup> This study evaluated filters rated MERV 13 or better. 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>.

<sup>7</sup> South Coast Air Quality Management District. May 2005. "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning" Accessed at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

SCAQMD Permits

If any subsequent development or activities implemented under the proposed project require a permit from SCAQMD, SCAQMD is a Responsible Agency. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the lead agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the proposed project. Further, when the lead agency makes the finding that the recommended mitigation measures are not feasible, the lead agency should describe the specific reasons for rejecting them in the final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at [rdalbeck@aqmd.gov](mailto:rdalbeck@aqmd.gov), if you have any questions regarding these comments.

Sincerely,

*Daniel Garcia*

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

DG/RD  
LAC180828-07  
Control Number