



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

November 13, 2018

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Attn: Paul Samaras, Principal Planner
City of El Segundo
350 Main Street
El Segundo, CA 90245

Draft Environmental Impact Report (DEIR) for the Proposed Park Place Extension and Grade Separation Project

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 CEQA document.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes construction to extend Park Place from Allied Way to Nash Street with a railroad grade separation for 0.25 miles. The project is located on the northeast corner of Sepulveda Boulevard and Rosecrans Avenue in the City of El Segundo.

SCAQMD Staff's Comments

The Lead Agency determined the proposed project would have less than significant impacts to regional air quality during construction.¹ Upon review of the DEIR, SCAQMD found that the Lead Agency did not adequately analyze the proposed project's air quality impacts. The Lead Agency quantified the maximum construction emissions for the proposed project's build alternative in pounds per day, but did not compare those emissions to SCAQMD's air quality CEQA significance thresholds to determine the proposed project's CEQA impacts.² Therefore, SCAQMD staff recommends that the Lead Agency compare the build alternative's construction emissions to SCAQMD's regional air quality CEQA significance thresholds in the final CEQA document to determine the level of significance. Using SCAQMD's CEQA significance thresholds would clearly identify whether the build alternative would result in significant air quality impacts under CEQA, disclose the magnitude of the impacts, facilitate the identification of feasible mitigation measures, and evaluate the level of impacts before and after mitigation measures.

Additionally, based on a review of the aerial photographs included in the DEIR, sensitive receptors are located within a quarter mile of the proposed project. Therefore, localized construction-related air quality impacts should be quantified and evaluated to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD's guidance for performing a localized air quality analysis can be found on SCAQMD's web page at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Response to Comments

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

¹ DEIR, Chapter 2, Page 2.2.5-9.

² DEIR, Chapter 3, *California Environmental Quality Act (CEQA) Evaluation*. Page 3-9.

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.

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Jillian Wong

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