



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed South Glendale Community Plan

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 develop a comprehensive set of incentives, standards, and requirements to provide a vision and policies to guide future development over time on 4.6 square miles (Proposed Project). Projected build-out residential and non-residential development would include a net increase of 10,377 dwelling units and 3,766 square feet for non-residential uses. The Proposed Project is generally bounded by State Route 134 to the north, State Route 2 to the east, Forest Lawn Memorial Park to the south, and the San Fernando Road Corridor to the west. The Proposed Project is expected to be developed over a period of 24 years between 2016 and 2040 at an annual growth rate of 1.01 percent¹.

SCAQMD Staff's Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational air quality emissions and compared those emissions to SCAQMD's regional air quality CEQA significance thresholds. Although the Proposed Project is anticipated to be developed over 24 years, the Proposed Project was modeled to begin in 2018 because future years are anticipated to have lower emission factors for construction equipment². Based on the analysis, the Lead Agency found that the Proposed Project's mitigated construction emissions would be less than SCAQMD's regional CEQA significance thresholds, except NO_x emissions, and that the Proposed Project's mitigated operational emissions would exceed SCAQMD's regional CEQA significance thresholds, except SO_x emissions.

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)³, which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air 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.

¹ Draft EIR. Section 4.2: Air Quality. Page 4.2-11.

² *Ibid.*

³ 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>.

General Comments

SCAQMD staff has reviewed the Air Quality Analysis in the Draft EIR and has comments on the methodology. Please see the attachment for more information. Additionally, as described in the 2016 AQMP, to achieve NOx emissions 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 attain the ozone NAAQS as expeditiously as practicable. The Proposed Project plays an important role in contributing to NOx emissions. Therefore, SCAQMD staff has comments on existing air quality mitigation measures and recommends additional mitigation measures to further reduce NOx emissions as well as ROG, PM10, and PM2.5 emissions. Finally, the attachment includes recommendations to include a discussion on SCAQMD Rule 403(e).

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 me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS

LAC180116-04

Control Number

ATTACHMENT

Air Quality Analysis – Interim Milestone Years

1. The Draft EIR included only two Air Quality analysis years for modeling: 2018⁴ and 2040 (buildout year). By 2040, the Proposed Project is assumed to be fully built based on the projections. Although the Proposed Project may not be at peak capacity in earlier years, it is possible that due to higher emission rates of vehicles, trucks, and equipment in earlier years, peak daily emissions may occur in 2018 and beyond. The overall emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and technologies have not been fully implemented and fleets have not fully turned over. Therefore, SCAQMD staff recommends that the Lead Agency include interim milestone years (i.e., year 2020, year 2025, year 2030, and year 2035) in the Air Quality Analysis to ensure the peak daily emissions are identified and adequately disclosed in the Final EIR. The interim milestone years will also assist in the demonstration of progress overtime from implementing air quality-related mitigation measures and policies included in the Draft EIR.

Air Quality Analysis – Phase Construction Activities

2. Based on a review of the Mitigation Measure (MM) 4.2-1, SCAQMD staff found that one of the air quality policies for the Proposed Project is to phase construction activities (Policy AQ-1(d))⁵ over a development period of 24 years. However, the Proposed Project's construction emissions were modeled and disclosed for year 2018 only in the Draft EIR⁶. Construction impacts after year 2018 may not have been accounted for determining the level of significance. Since phase construction activities over years are reasonably foreseeable (Policy AQ-1(d)), to represent a worst-case construction impact scenario, SCAQMD staff recommends that the Lead Agency model all of the Proposed Project's construction activities in a single year and disclose the maximum construction emissions from criteria pollutants in the Final EIR. Alternatively, the Lead Agency should use its best efforts to find out construction activities by year and quantify associated emissions to be included in the Final EIR.

Air Quality Analysis – Overlapping Construction and Operational Impacts

3. When specific development is reasonably foreseeable as a result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated.

Based on a review of the Air Quality Analysis, SCAQMD staff found that the Lead Agency did not analyze a scenario where construction activities overlap with operational activities. Since implementation of the Proposed Project is expected to occur over a period of 24 years from 2016 to 2040, an overlapping construction and operation scenario is reasonably foreseeable, unless the Proposed Project includes requirement(s) that will prohibit overlapping construction and operational activities. To properly analyze a worst-case impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared, SCAQMD staff recommends that the Lead Agency identify the overlapping years, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA

⁴ Draft EIR. Section 4.2: Air Quality. Page 4.2-11.

⁵ Draft EIR. Section 2.8: Summary of Environmental Impacts and Mitigation Measures. Page 2-10.

⁶ Draft EIR. Section 4.2: Air Quality. Table 4.2-6. Page 4.2-15.

operational thresholds of significance to determine the level of significance in the Final EIR. In the event that the Lead Agency, after revising the Air Quality Analysis, finds that the Proposed Project's air quality impacts would be significant, mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on suggested potential mitigation measures as guidance to the Lead Agency, please see Comment No. 7 below and visit SCAQMD's CEQA Air Quality Handbook website⁷.

Air Quality Analysis – Localized Significance Thresholds Analysis

4. Based on the information in the environmental settings and a review of aerial maps, SCAQMD staff found that the Proposed Project is potentially surrounded by sensitive receptors. Therefore, SCAQMD staff recommends that the Lead Agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the SCAQMD website. In the event that the Lead Agency finds, after its analyses, that the Proposed Project would exceed SCAQMD's localized air quality CEQA significance thresholds⁸, mitigation measures are required.

Additional Consideration for Existing Mitigation Measure (MM) 4.2-1

5. As part of MM 4.2-1 for the Proposed Project, the Lead Agency is committed to four air quality policies to reduce construction related emissions associated with future development projects implemented under the Proposed Project. One of the air quality policies (Policy AQ-1(b)) "requires construction contractors to use off-road equipment that meets CARB's most recent certification for off-road diesel engines or Best Available Control Technology (BACT)⁹." Consistent with Policy AQ-1(b), SCAQMD staff recommends that the Lead Agency require construction contractors to use Tier 4 construction equipment. Detailed consideration is italicized as follows:

All off-road diesel-powered construction equipment shall meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the Lead Agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the Lead Agency must demonstrate through future study with written findings supported by substantial evidence before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously.

Additional Consideration for Existing MM 4.2-3

6. As part of MM 4.2-3 for the Proposed Project, the Lead Agency is committed to two air quality policies (Policy HRA-1 and Policy HRA-2) to exposure of new sensitive receptors to pollution sources associated with future development projects implemented under the Proposed Project. Policy HRA-2 requires, among others, high efficiency filters¹⁰." SCAQMD staff recommends that the Lead Agency consider limits to high efficiency filters and ensure that these filters are enforceable throughout the lifetime of the Proposed Project if they are used. Detailed consideration is italicized as follows:

⁷ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁸ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

⁹ Draft EIR. Section 2.8: Summary of Environmental Impacts and Mitigation Measures. Page 2-10.

¹⁰ *Ibid.* Page 2-12.

Limits to High Efficiency or Enhanced Filtration Units

SCAQMD staff recommends that the Lead Agency consider the limitations of the high efficiency or enhanced filtration units. For example, in a study that SCAQMD conducted to investigate filters¹¹, 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 resident. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the analysis in the Draft EIR does not account for the times when the residents have their windows or doors open or are in common space areas of the project. In addition, these filters have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of any filtration units should therefore be evaluated in more detail prior to assuming that they will sufficiently alleviate near roadway exposures to DPM emissions. The evaluation should be included as a mandatory requirement as part of Policy HRA-2 or as a new HRA policy in the Final EIR.

Enforceability of High Efficiency or Enhanced Filtration Units

In the event that high efficiency or enhanced filtration units are used, and to ensure that they are enforceable throughout the lifetime of the Proposed Project as well as effective in reducing exposures to DPM emissions, SCAQMD staff recommends that the Lead Agency provide additional details on future operational and maintenance implementation and monitoring of filters in the Final EIR. At a minimum, the Final EIR should provide detailed information about the responsible implementing and enforcement agency (or entity); recommended schedules for replacing the high efficiency or enhanced filtration units; ongoing monitoring schedules; ongoing cost sharing strategies, if any, for replacing the high efficiency or enhanced filtration units; disclosure on increased energy costs for running the HVAC system to prospective residents; criteria for assessing progress in installing and replacing the enhanced filtration units; and process for evaluating the effectiveness of the enhanced filtration units. Enforceability should be made a mandatory requirement as part of Policy HRA-2 or as a new HRA policy in the Final EIR.

Additional Recommended Mitigation Measures

7. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce emissions, particularly from ROG, NOx, and particulate matter. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website.
 - a) Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction and operation, and if the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum.
 - b) Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEVs and/or battery powered vehicles.

¹¹ 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 South Coast Air Quality Management District: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x and ROG 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 building. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.

- c) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- d) Limit parking supply and unbundle parking costs.
- e) Maximize the planting of trees in landscaping and parking lots.
- f) Use light colored paving and roofing materials.
- g) Install light colored “cool” roofs and cool pavements.
- h) Require use of electric or alternatively fueled sweepers with HEPA filters.
- i) Require use of electric lawn mowers and leaf blowers.
- j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- k) Use of water-based or low VOC cleaning products.

To further reduce particulate matter from the Proposed Project, SCAQMD staff recommends that the Lead Agency include the following mitigation measures in the Final EIR.

- a) Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible plumes emanate from the site and stabilize all disturbed areas.
- b) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation.
- c) Sweep all streets at least once a day using SCAQMD Rule 1186, 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).
- d) Apply water three times daily, or non-toxic soil stabilizers according to manufacturers’ specifications, to all unpaved parking or staging areas, unpaved road surfaces, or to areas where soil is disturbed.

Compliance with SCAQMD Rule 403(e) – Large Operations

- 8. The Lead Agency included a discussion on general compliance with SCAQMD Rule 403 in the Draft EIR. Based on the project description, the Proposed Project is a large operation of approximately 4.6 square miles or approximately 3,000 acres (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast

Air Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations¹², which includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class¹³. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with SCAQMD Rule 403(e) in the Final EIR. Compliance with SCAQMD Rule 403(e) will further reduce particulate matter from the Proposed Project.

¹² South Coast Air Quality Management District Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

¹³ South Coast Air Quality Management District Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.