



South Coast Air Quality Management District

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Mitigated Negative Declaration (MND) for the Proposed ENV-2017-4078: 6711 S. Sepulveda Boulevard

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 CEQA Document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes the demolition of an existing self-storage facility, and the construction and operation of an 8-story residential building with 180 dwelling units on a 1.23 acre site (proposed project).¹ The proposed project site is located adjacent to Interstate-405 (I-405). Construction of the proposed project is expected to occur over a 24-month period, beginning in 2018.²

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency determined that the proposed project would result in less than significant regional and localized air quality impacts during construction and operation. As mentioned above, the project consists of 180 residential dwellings, which are considered sensitive receptors, and the proposed project site is located within 500 feet of I-405. Therefore, SCAQMD staff recommends the lead agency consider the effects of Diesel Particulate Matter (DPM). Detailed comments are provided below.

Guidance on Siting Sensitive Receptors Near a High-Volume Freeway and Other Sources of Air Pollution
Guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. Based on a review of the project description, project location, and Figure III-1, SCAQMD staff found that the proposed project is located less than 500 feet west of I-405 Freeway. Residents living at the proposed project could be exposed to diesel particulate matter (DPM) emissions from vehicles and diesel-fueled heavy-duty trucks traveling on I-405 Freeway, and may also be exposed to toxic emissions from the nearby industrial operations. DPM is a toxic air contaminant and a carcinogen.

¹ IS/MND. Page I-1

² IS/MND. Page II-29

To facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the lead agency consider the health impacts on people at the proposed project by performing a HRA³ analysis to disclose the potential health risks in the final CEQA document. Should a significant increase in the Maximum Individual Cancer Risk, and/or increased cancer burden be identified, the lead agency should incorporate mitigation measures specific to reducing the exposure of residents at the proposed project, to health risk impacts associated with high-volume freeways and industrial facilities, such as installing HV systems that meet MERV 13 standard. Additional guidance to address these concerns are available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>. Should the lead agency find a significant increase in the Maximum Individual Cancer Risk, and/or increased cancer burden, applicable mitigation measures should be incorporated.

Permits and Rule Compliance

In the event that the proposed project requires a permit from the SCAQMD, then the SCAQMD should be identified as a Responsible Agency for the proposed project. 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.

Regarding demolitions, SCAQMD Rules 1403 and 403 apply. Rule 1403, Asbestos Emissions from Demolition /Renovation Activities, requires a thorough asbestos survey performed by a licensed Certified Asbestos Consultant (CAC) before demolition or renovation, and asbestos containing materials (ACM) be removed, handled, packaged, labeled and disposed of by a licensed asbestos abatement contractor. The rule specifies removal methods. Rule 403, Fugitive Dust, applies to demolitions also to prevent fugitive dust from crossing the property lines. Dust suppression is mainly achieved by the application of water and prevention of runoff that may dry and generate fugitive dust.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA Document. The 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, if you have any questions regarding these comments.

Sincerely,

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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/airquality-analysis-handbook/mobile-source-toxics-analysis>.