



South Coast Air Quality Management District

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Mitigated Negative Declaration (MND) for the Proposed ENV-2017-4389 at 2803 West Broadway

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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish a 6,403-square-foot building and construction of an 87,084-square-foot storage building on 30,153 square feet (Proposed Project). Based on a review of aerial photographs, SCAQMD staff found that a school is located next to the Proposed Project.

SCAQMD Staff's Comments on Air Quality Analysis

SCAQMD staff recommends that the Lead Agency provide substantial evidence in the Final MND to support a fair argument that the Proposed Project's construction and operational air quality impacts are less than significant. In the air quality analysis of the MND, the Lead Agency stated that the project's construction and operational ROG, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} emissions were estimated to be less than the SCAQMD thresholds¹. The Lead Agency also stated that "a project of this size (87,084 square feet of storage building for household goods) would not likely exceed the project-level SCAQMD localized significant thresholds for criteria air pollutants and the impact would be less than significant."²

The Lead Agency did not include the estimations in the MND³ or quantify the Proposed Project's construction (regional and localized) and operational emissions to support the less than significant conclusions. One of the basic purposes of CEQA is to inform government decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A mitigated negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment after incorporating mitigation measures (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented in the initial study. Without quantifying emissions from construction and operational activities, the MND has not made that documentation which serves as substantial evidence to support a fair argument that the Proposed Project would not have any adverse effects on air quality. Therefore, SCAQMD staff recommends that the Lead Agency quantify and disclose the Proposed Project's air quality impacts in the Final MND.

¹ MND. Page 20.

² *Ibid.*

³ Please note that no air quality technical study documenting the estimations was included with the MND that was circulated for public review and comments from February 8, 2018 to March 1, 2018.

Regional and Localized Air Quality Analysis during Construction

Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). SCAQMD staff recommends that the Lead Agency quantify criteria pollutant emissions from construction activities and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts.

Based a review of aerial photographs, SCAQMD staff found that the Proposed Project is located next to sensitive receptors (e.g., school). Therefore, SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's localized emissions and disclose the localized air quality impacts in the Final MND 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 is available on SCAQMD website⁴.

Operational Air Quality Analysis

The Lead Agency should identify any potential adverse air quality impacts from operation of the Proposed Project. Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. In the event that operation of the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, and since the Proposed Project is located next to a school, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment⁵. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

California Emission Estimator Model (CalEEMod)

SCAQMD staff recommends that the Lead Agency estimate the Proposed Project's short- and long-term air quality impacts using the current version of California Emission Estimator Model (CalEEMod)⁶. This software is free of charge and incorporates up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. The Proposed Project's emissions can also be estimated by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook⁷.

Mitigation Measures

In the event that the Lead Agency concludes after its analyses that construction or operational emissions would exceed SCAQMD's air quality CEQA daily significance thresholds, feasible mitigation measures to minimize these impacts are required. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

⁴ South Coast Air Quality Management District. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

⁵ 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>.

⁶ South Coast Air Quality Management District. CalEEMOD (version 2016.3.2). Accessed at: <http://caleemod.com/>.

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

- Chapter 11 of SCAQMD's CEQA Air Quality Handbook.
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>.

SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

Since the Proposed Project would include demolition of a 6,403-square-foot building, which was built in 1972⁸, asbestos may be encountered during demolition. As such, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403 in the Final MND.

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. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

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

Lijin Sun, J.D.

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Planning, Rule Development & Area Sources

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⁸ MND, Page 24.