



# 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 Beach Cities Media Campus Project (SCH No.: 2017121035)**

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 construct four buildings with office and retail uses totaling 313,000 square feet on 6.39 acres (Proposed Project). The Proposed Project is located at 2021 Rosecrans Avenue on the northeast corner of Rosecrans Avenue and Village Drive in the City of El Segundo. Based on a review of the Draft EIR, SCAQMD staff found that historically the site was previously developed with an air gas manufacturing plant from 1969 through 2016<sup>1</sup>. As a result of historical usage, soil at the site was found to be impacted with total petroleum hydrocarbons (TPHs), lead, PCBs, and volatile organic compounds (VOCs)<sup>2</sup>. Impacted soil was removed from the site to the levels required for commercial development, and a letter of No Further Action was issued in August 2017<sup>3</sup>. Groundwater remedial action appears to be ongoing<sup>4</sup>.

### Compliance with SCAQMD Rules & Permits

Since the Proposed Project includes grading and site preparation activities that might cause residual TPHs, lead, PCBs, and VOCs to become airborne during construction, and in addition to a discussion on SCAQMD Rule 1166 – Volatile Organic Compounds from Decontamination of Soil, the Lead Agency should include a discussion to demonstrate compliance with SCAQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>5</sup> in the Air Quality Section of the Final EIR, among the list of other applicable SCAQMD Rules. If on-site groundwater remediation or any on-site activity would involve equipment or operations, which either emits or controls air pollution, SCAQMD Engineering and Permitting staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to the start of any remedial activities or operations. In the event that implementation of the Proposed Project requires a permit from SCAQMD, the Lead Agency should identify SCAQMD as a Responsible Agency for the Proposed Project in the Final EIR. Emissions from permitted equipment should be quantified and added to the Proposed Project's construction and operational emissions, where applicable, to determine the level of significance. Any assumptions in the Air Quality Analysis in the Final EIR will be used as the basis for

<sup>1</sup> Draft EIR. Hazards and Hazardous Materials. Page IV.E.1 - IV.E.3.

<sup>2</sup> *Ibid.*

<sup>3</sup> *Ibid.*

<sup>4</sup> Draft EIR Appendices. Appendix E.1. Phase 1 Environmental Site Assessment. Pages 738-786.

<sup>5</sup> South Coast Air Quality Management District. Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

permit conditions and limits. For more information on permits, please visit SCAQMD's 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, informative, 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](mailto:amullins@aqmd.gov) or (909) 396-2402, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM

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