



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed ENV-2018-6891: 12681 W. Jefferson Blvd

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 construct a 120,426-square-foot public storage warehouse on 3.25 acres (Proposed Project). The Proposed Project is located on the southwest corner of Westlawn Avenue and Jefferson Boulevard in the community of Palms-Mar Vista-Del Rey. Upon review of the MND and aerial photographs, SCAQMD staff found that residential units are within 200 feet of the Proposed Project¹. Construction is expected to take 11 months to complete, beginning in mid-2020².

SCAQMD Staff's Summary of Air Quality Analyses

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional construction and operational air quality impacts would be less than significant³.

SCAQMD Staff's General Comments

Upon review of the MND, the Air Quality Technical Study, and the CalEEMod output files, SCAQMD staff found that there is an inconsistency in the less than significant finding for localized air quality impacts during construction, and that the Proposed Project's localized air quality impact during construction would be significant. Therefore, SCAQMD staff recommends that the Lead Agency clarify the localized air quality impacts during construction, and if the impacts are found to be significant, mitigation measures are required and should be disclosed in the Final MND. Please see the attachment for more information. The attachment also includes a list of recommended mitigation measures as suggested resources and guidance to the Lead Agency to assist the identification of mitigation measures for incorporation in the Final MND.

Conclusion

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 SCAQMD with written responses to all comments contained herein prior to the

¹ MND. Section 4 Environmental Impact Analysis "III. Air Quality" Page 27.

² MND. Section 3 Project Description. Page 9.

³ MND. Section 4 Environmental Impact Analysis "III. Air Quality" Page 25-28.

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, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that the additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting these mitigation measures in the Final MND (CEQA Guidelines Section 15074.1).

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,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
LAC190402-01
Control Number

ATTACHMENT

Localized Air Quality Impacts - Construction

1. The Lead Agency found that even with the modeling assumption of Regulatory Compliance Construction, the Proposed Project’s localized construction air quality impacts would result in 5.8 pounds per day (lbs/day) of PM2.5⁴, which would exceed SCAQMD’s Localized Significance Threshold (LST) of 3 lbs/day for PM2.5 for the Northwest Coastal Los Angeles County Source Receptor Area (SRA)⁵. However, as highlighted in Table 1⁶ and Table 2⁷, the Lead Agency found that the Proposed Project’s localized construction emissions would not result in an exceedance. SCAQMD staff recommends that the Lead Agency correct Table III-3 and Table 10 and revise the level of significance finding for the Proposed Project’s localized construction air quality in the Final MND.

Table 1: SCAQMD Staff’s Copy of Table III-3: LST Maximum On-site Emissions

**Table III-3
LST Maximum On-Site Emissions**

Source	NOx	CO	PM10	PM2.5
pounds/day				
Construction				
Total maximum emissions	19	23	8	5
LST threshold	187	1,210	10	3
Threshold exceeded?	No	No	No	No
Operational				
Area/energy emissions	<1	<1	<1	<1
LST threshold	187	1,210	5	2
Threshold exceeded?	No	No	No	No

Notes:
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic gases; SOx = sulfur oxides.
Refer to Air Quality Modeling Results in Attachment 1.
LST values for a 1-acre site were used in the analysis.

Table 2: SCAQMD Staff’s Copy of Table 10: Localized Construction and Operational Emissions

**Table 10
Localized Construction and Operational Emissions**

Source	NOx	CO	PM10	PM2.5
On-Site Emissions (pounds/day)				
Construction				
Total maximum emissions	19	23	8	5
LST threshold	187	1,210	10	3
Threshold Exceeded?	No	No	No	No
Operational				
Project area/energy emissions	<1	<1	<1	<1
LST threshold	187	1,210	5	2
Threshold Exceeded?	No	No	No	No

Notes:
Totals in table may not appear to add exactly due to rounding in the computer model calculations.
Net total area/energy emissions of the Project represents the net difference between the existing operational uses that would be removed and the Project operational emissions.
CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.
LST for a 3.63-acre site.
Refer to Appendix A.1 (Proposed Summer) and Appendix A.2 (Proposed Winter), Sections 3.2 through 3.7, for maximum on-site emissions during both the summer and winter seasons.

⁴ MND. CalEEMod output file for Public Storage Playa Vista – Los Angeles – South Coast County, Winter “Site Preparation Regulatory Compliance Construction On-Site”. Page 49.

⁵ MND. Section 4 Environmental Impact Analysis “III. Air Quality” Page 28.

⁶ Ibid.

⁷ MND. Air Quality Study for the Playa Vista Public Storage Project. Page 20.

Recommended Mitigation Measures:

In the event that the Lead Agency finds, after revisions to the Air Quality Analysis based on Comment No. 1, that the Proposed Project's localized construction emissions would be significant, identification and implementation of feasible mitigation measures would be required under CEQA. SCAQMD staff has compiled a list of recommended mitigation measures as suggested resources and guidance to the Lead Agency to assist the identification of feasible mitigation measures for incorporation in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁸.

Mitigation Measures for Construction Air Quality Impacts from Off-Road Equipment

- Use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions⁹. A list of CARB verified DPFs are available on the CARB website¹⁰. Additionally, the Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply such equipment prior to ground disturbing activities. A copy of each unit's certified tier specification and CARB or SCAQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Lead Agency should, at a minimum, specify in the Final MND that using Tier 3 or newer construction equipment is a project requirement that contractor(s) must provide evidence to the Lead Agency for review and approval prior to the commencement of any construction activities.
- Maintain equipment maintenance records for the construction portion of the Proposed Project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- Encourage construction contractors to apply for SCAQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at SCAQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

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

⁹ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

¹⁰ *Ibid.* Page 18.